



# 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: March 31, 2014

RE: Clondalkin Pharma & Healthcare/163-34184-00097

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

## Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

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 from 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-AM.dot 6/13/2013



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Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

Betty Lantaff  
Clondalkin Pharma & Healthcare  
1100 East Louisiana Street  
Evansville, Indiana 47711

March 31, 2014

Re: 163-34184-00097  
Administrative Amendment to  
M163-30362-00097

Dear Ms. Lantaff:

Clondalkin Pharma & Healthcare was issued a Minor Source Operating Permit (MSOP) Renewal No. M163-30362-00097 on August 10, 2011 for a stationary commercial lithographic printing facility located at 1100 East Louisiana Street, Evansville, Indiana. On February 14, 2014, the Office of Air Quality (OAQ) received an application from the source requesting the removal of two (2) existing permitted emission units, described as follows.

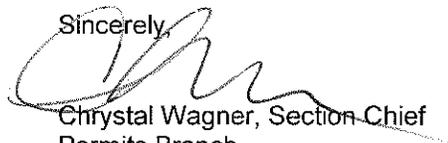
- (a) One (1) KBA Planeta non-heatset offset lithographic roll coating, sheet-fed printing press constructed in 1991, identified as 31, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, with no exhaust; and
- (b) One (1) Svecia UV screen printing press constructed in 1987, identified as 06, with a maximum line speed of 92 feet per minute and a maximum printing width of forty-seven (47) inches, exhausting at two (2) stacks, identified as VO6A and VO6B.

The attached Technical Support Document (TSD) provides additional explanation of the changes to the source and permit. Pursuant to the provisions of 326 IAC 2-6.1-6(d)(2)(B), an administrative amendment to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the administrative amendment into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Donald McQuigg of my staff at 317-234-4240 or 1-800-451-6027, and ask for extension 4-4240.

Sincerely,

  
Chrystal Wagner, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document  
Calculations  
Revised Permit

CW/dm

cc: File - Vanderburgh County  
insert text County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch





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Michael R. Pence  
*Governor*

Thomas W. Easterly  
*Commissioner*

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

**Clondalkin Pharma and Healthcare  
1100 E Louisiana Street  
Evansville, Indiana 47711**

(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.: M163-30362-00097.	
Issued by/Signed by: Alfred C. Dumauual, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 10, 2011  Expiration Date: August 10, 2021

Administrative Amendment No.: 163-34184-00097	
Issued by/Signed by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 31, 2014  Expiration Date: August 10, 2021



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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)]

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The Permittee owns and operates a stationary commercial lithographic printing facility.

Source Address:	1100 E Louisiana St, Evansville, Indiana 47711
General Source Phone Number:	(812) 464-2461
SIC Code:	2752 (Commercial Printing, Lithographic)
County Location:	Vanderburgh
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

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

- (a) One (1) KBA Planeta non-heatset offset lithographic roll coating, sheet-fed printing press constructed in 1991, identified as 31, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, with no exhaust;
- (b) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press, constructed in 2004, identified as 41, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting to one (1) stack, identified as S41;
- (c) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1995, identified as 42, with a maximum line speed of 506 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S42;
- (d) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1997, identified as 43, with a maximum line speed of 583 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S43;
- (e) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1998, identified as 44, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting at one (1) stack, identified as S44;
- (f) One (1) Svecia UV screen printing press constructed in 1987, identified as 06, with a maximum line speed of 92 feet per minute and a maximum printing width of forty-seven (47) inches, exhausting at two (2) stacks, identified as VO6A and VO6B;
- (g) One (1) pneumatic collection system to collect scrap paper which is fed into one (1) of two (2) balers. Pneumatic collection system is equipped with a cyclone that is considered part of the material handling equipment;

- (h) One (1) AGFA Luxel Saber VX Plate Setter constructed in 2005, identified as AGFA, with a maximum capacity of thirty two (32) plates per hour, exhausting heat through one (1) stack identified as VPP01;
- (i) One (1) Avantra Image Setter constructed in 2005, identified as Avantra, with a maximum capacity of twenty (20) sheets per hour, exhausting heat through one (1) stack identified as VPP02;
- (j) One (1) parts washer identified as PW02, constructed in 2005, upgraded to a thirty gallon capacity in 2011. The parts washer is equipped with a basin and lid, does not exceed one hundred forty-five (145) gallons per twelve (12) month total of mineral spirits. [326 IAC 8-3-2][326 IAC 8-3-8]

## **SECTION B GENERAL CONDITIONS**

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

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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, M163-30362-00097, is issued for a fixed term of ten (10) 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]**

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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**

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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**

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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**

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

### **B.7 Duty to Provide Information**

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- (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)]**

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- (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]**

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- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
  - (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.

The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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.

- (c) 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.
- (d) 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]**

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- (a) All terms and conditions of permits established prior to M163-30362-00097 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)]**

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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]**

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- (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]**

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- (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]**

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- (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]**

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

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

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

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

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

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

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

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- (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.8 Performance Testing [326 IAC 3-6]

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- (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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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- (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.12 Response to Excursions or Exceedances**

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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.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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.14 Malfunctions Report [326 IAC 1-6-2]**

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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.15 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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- (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.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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- (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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press, constructed in 2004, identified as 41, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting to one (1) stack, identified as S41;
- (b) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1995, identified as 42, with a maximum line speed of 506 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S42;
- (c) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1997, identified as 43, with a maximum line speed of 583 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S43;
- (d) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1998, identified as 44, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting at one (1) stack, identified as S44;
- (e) One (1) pneumatic collection system to collect scrap paper which is fed into one (1) of two (2) balers. Pneumatic collection system is equipped with a cyclone that is considered part of the material handling equipment;
- (f) One (1) AGFA Luxel Saber VX Plate Setter constructed in 2005, identified as AGFA, with a maximum capacity of thirty two (32) plates per hour, exhausting heat through one (1) stack identified as VPP01;
- (g) One (1) Avantara Image Setter constructed in 2005, identified as Avantara, with a maximum capacity of twenty (20) sheets per hour, exhausting heat through one (1) stack identified as VPP02; and
- (h) One (1) parts washer identified as PW02, constructed in 2005, upgraded to a thirty gallon capacity in 2011. The parts washer is equipped with a basin and lid, does not exceed one hundred forty-five (145) gallons per twelve (12) month total of mineral spirits. [326 IAC 8-3-2][326 IAC 8-3-8]

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

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

#### D.1.1 Organic Solvent Degreasing Operations [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements):

- (a) The Permittee shall ensure the following control equipment and operating requirements are met:
  - (1) Equip the degreaser with a cover.
  - (2) Equip the degreaser with a device for draining cleaned parts.

- (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.
  - (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) The Permittee shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.
    - (E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition 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.1.2 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-8]

- (a) Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure than 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).
- (b) Pursuant to 326 IAC 8-3-8(c)(2), on and after January 1, 2015, the following records shall be maintained for each purchase of cold cleaner degreaser solvent:
  - (1) The name and address of the solvent supplier.

- (2) The date of purchase (or invoice/bill dates 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).
- (c) All records required by 326 IAC 8-3-8(c)(2) shall be:
- (1) retained on-site or accessible electronically from the site for the most recent three (3) year period; and
  - (2) reasonably accessible for an additional two (2) year period.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the printing presses (41 through 44) and the parts washer (PW02). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Clondalkin Pharma and Healthcare
<b>Address:</b>	1100 E Louisiana St
<b>City:</b>	Evansville, Indiana 47711
<b>Phone #:</b>	(812) 464-2461
<b>MSOP #:</b>	M163-30362-00097

I hereby certify that Clondalkin Pharma and Healthcare is :  still in operation.  
 no longer in operation.  
I hereby certify that Clondalkin Pharma and Healthcare is :  in compliance with the requirements of MSOP M163-30362-00097.  
 not in compliance with the requirements of MSOP M163-30362-00097.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

### 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 ?\_\_\_\_\_, 25 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 CAUSED 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 ?    Y        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:

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# Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for an Administrative Amendment to a Minor Source Operating Permit (MSOP)

### Source Description and Location

<b>Source Name:</b>	Clondalkin Pharma & Healthcare
<b>Source Location:</b>	1100 East Louisiana Street, Evansville, Indiana 47711
<b>County:</b>	Vanderburgh
<b>SIC Code:</b>	2752
<b>Operation Permit No.:</b>	M163-30362-00097
<b>Operation Permit Issuance Date:</b>	August 10, 2011
<b>Administrative Amendment No.:</b>	163-34184-00097
<b>Permit Reviewer:</b>	Donald McQuigg

On February 13, 2014, the Office of Air Quality (OAQ) received an application from Clondalkin Pharma & Healthcare related to a modification to an existing stationary commercial lithographic printing facility.

### Existing Approvals

The source was issued MSOP Renewal No. M163-30362-00097 on August 10, 2011. There have been no subsequent approvals issued.

### County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Attainment effective October 27, 2011, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

<sup>1</sup>Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh 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.

:

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
  
- (b) **PM<sub>2.5</sub>**  
Vanderburgh County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> 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<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

**Fugitive Emissions**

- (a) The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases 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.

**Status of the Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

This PTE table is from the TSD or Appendix A of MSOP Renewal No. M163-30362-00097, issued on August 10, 2011.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)*									
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Press 41	-	-	-	-	-	0.03	-	-	4.83	3.06 (xylene)
Press 42	-	-	-	-	-	0.05	-	-		
Press 43	-	-	-	-	-	0.06	-	-		
Press 44	-	-	-	-	-	0.03	-	-		
Press 06	-	-	-	-	-	0.00	-	-		
Press 31	-	-	-	-	-	0.05	-	-		
Solvents <sup>(1)</sup> (printing presses)	-	-	-	-	-	55.82	-	-	0.78	0.78 (xylene)
Parts Washer (PW02)	-	-	-	-	-	0.05	-	-	-	-
<b>Total PTE of Entire Source</b>	-	-	-	-	-	<b>56.08</b>	-	-	<b>5.61</b>	<b>3.84 (xylene)</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)*									
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
negl. = negligible *These emissions are based upon MSOP Renewal No. M163-30362-00097 issued on August 10, 2011. **The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for GHG in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. <sup>(1)</sup> The solvent emissions for press 31 were inadvertently left out of the total VOC emissions as determined in the Appendix A calculations for MSOP Renewal No. M163-30362-00097. Therefore, the correct total is 55.82 tons/yr.										

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Clondalkin Pharma & Healthcare on February 13, 2014, relating to the removal of existing permitted emission units.

The following is a list of the existing permitted emission units removed from the source:

- (a) One (1) KBA Planeta non-heatset offset lithographic roll coating, sheet-fed printing press constructed in 1991, identified as 31, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, with no exhaust; and
- (b) One (1) Svecia UV screen printing press constructed in 1987, identified as 06, with a maximum line speed of 92 feet per minute and a maximum printing width of forty-seven (47) inches, exhausting at two (2) stacks, identified as VO6A and VO6B.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – MSOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP
Press 06	-	-	-	-	-	0.00	-	-	0	0
Press 31	-	-	-	-	-	-0.05	-	-	0	0
Solvents (printing presses)	-	-	-	-	-	-12.86	-	-	-0.18	-0.18 (xylene)
<b>Total PTE of Proposed Revision</b>	-	-	-	-	-	<b>-12.91</b>	-	-	<b>-0.18</b>	<b>-0.18 (xylene)</b>

negl. = negligible ; "-" denotes emission units does not emit the designated pollutant.

Pursuant to 326 IAC 2-6.1-6(d)(2)(B), this change to the permit is considered an administrative amendment because the permit is amended to change the descriptive information concerning the source or emissions unit(s), where the revision will not trigger a new applicable requirement.

The uncontrolled/unlimited potential to emit of the entire source after the removal of two (2) printing presses, identified as 06 and 31, will continue to be within the threshold levels specified in 326 IAC 2-6.1 (MSOP). See Appendix A for the revised limited PTE of the source after removal of the two (2) printing presses, identified as 06 and 31.

**PTE of the Entire Source After Issuance of the MSOP Revision**

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~struckthrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Press 41	-	-	-	-	-	0.03	-	-	4.83	3.06 (xylene)
Press 42	-	-	-	-	-	0.05	-	-		
Press 43	-	-	-	-	-	0.06	-	-		
Press 44	-	-	-	-	-	0.03	-	-		
Solvents (printing presses)	-	-	-	-	-	42.96	-	-	0.60	0.60 (xylene)
<b>Total PTE of Entire Source</b>	-	-	-	-	-	<b>43.17</b>	-	-	<b>5.43</b>	<b>3.66 (xylene)</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible  
 \*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".  
 \*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject-to-regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

**MSOP Status**

- (a) This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).
- (b) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit greenhouse gases (GHG) will still be less than the Title V subject-to-regulation

threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) emissions per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

### Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: M163-30362-00097, issued on August 10, 2011.

### Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

#### 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) KBA Planeta non-heatset offset lithographic roll coating, sheet-fed printing press constructed in 1991, identified as 31, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, with no exhaust;~~
- (**b a**) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press, constructed in 2004, identified as 41, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting to one (1) stack, identified as S41;
- (**e b**) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1995, identified as 42, with a maximum line speed of 506 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S42;
- (**d c**) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1997, identified as 43, with a maximum line speed of 583 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S43;
- (**e d**) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1998, identified as 44, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting at one (1) stack, identified as S44;
- (f) ~~One (1) Svecia UV screen printing press constructed in 1987, identified as 06, with a maximum line speed of 92 feet per minute and a maximum printing width of forty seven (47) inches, exhausting at two (2) stacks, identified as VO6A and VO6B;~~
- (**g e**) One (1) pneumatic collection system to collect scrap paper which is fed into one (1) of two (2) balers. Pneumatic collection system is equipped with a cyclone that is considered part of the material handling equipment;
- (**h f**) One (1) AGFA Luxel Saber VX Plate Setter constructed in 2005, identified as AGFA, with a maximum capacity of thirty two (32) plates per hour, exhausting heat through one (1) stack identified as VPP01;
- (**i g**) One (1) Avantra Image Setter constructed in 2005, identified as Avantra, with a maximum capacity of twenty (20) sheets per hour, exhausting heat through one (1) stack identified as VPP02;

- (j h) One (1) parts washer identified as PW02, constructed in 2005, upgraded to a thirty gallon capacity in 2011. The parts washer is equipped with a basin and lid, does not exceed one hundred forty-five (145) gallons per twelve (12) month total of mineral spirits.

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

##### Emissions Unit Description:

- (a) ~~One (1) KBA Planeta non-heatset offset lithographic roll coating, sheet-fed printing press constructed in 1991, identified as 31, with a maximum line speed of 506 feet per minute, and a maximum printing width of forty (40) inches, with no exhaust;~~
- (b a) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press, constructed in 2004, identified as 41, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting to one (1) stack, identified as S41;
- (c b) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1995, identified as 42, with a maximum line speed of 506 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S42;
- (d c) One (1) Man-Roland Series 726 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1997, identified as 43, with a maximum line speed of 583 feet per minute and a maximum printing width of forty (40) inches, exhausting at one (1) stack, identified as S43;
- (e d) One (1) Man-Roland Series 327 non-heatset offset lithograph roll coating, sheet-fed printing press constructed in 1998, identified as 44, with a maximum line speed of 415 feet per minute and a maximum printing width of twenty nine (29) inches, exhausting at one (1) stack, identified as S44;
- (f) ~~One (1) Svecia UV screen printing press constructed in 1987, identified as 06, with a maximum line speed of 92 feet per minute and a maximum printing width of forty seven (47) inches, exhausting at two (2) stacks, identified as VO6A and VO6B;~~
- (g e) One (1) pneumatic collection system to collect scrap paper which is fed into one (1) of two (2) balers. Pneumatic collection system is equipped with a cyclone that is considered part of the material handling equipment;
- (h f) One (1) AGFA Luxel Saber VX Plate Setter constructed in 2005, identified as AGFA, with a maximum capacity of thirty two (32) plates per hour, exhausting heat through one (1) stack identified as VPP01;
- (i g) One (1) Avantra Image Setter constructed in 2005, identified as Avantra, with a maximum capacity of twenty (20) sheets per hour, exhausting heat through one (1) stack identified as VPP02;
- (j h) One (1) parts washer identified as PW02, constructed in 2005, upgraded to a thirty gallon capacity in 2011. The parts washer is equipped with a basin and lid, does not exceed one hundred forty-five (145) gallons per twelve (12) month total of mineral spirits.

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

\*\*\*

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the printing presses (~~34~~, 41 through 44, ~~and 06~~) and the parts washer (PW02). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Additional Changes**

IDEM, OAQ has included additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

1. Vanderburgh County has been redesignated, effective October 27, 2011, to attainment for PM<sub>2.5</sub>. The Source Location Status is revised to reflect this change.
2. The rules regulating Organic Solvent Degreasing Operations (326 IAC 8-3), were amended and the revisions became effective on March 1, 2013. Therefore, the rule applicability has been re-evaluated for this source and the citations and requirements in Section A.2, Section D.3, Condition D.1.1, and Condition D.1.2 have changed.
3. IDEM has clarified the following condition to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

The permit has been revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

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

The Permittee owns and operates a stationary commercial lithographic printing facility.

\*\*\*.

County Location:

\*\*\*

Vanderburgh

Source Location Status:

~~Nonattainment for PM<sub>2.5</sub> standard~~

Attainment for all ~~other~~ criteria pollutants

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source also includes the following insignificant activities:

\*\*\*

- (n) One (1) parts washer identified as PW02, constructed in 2005, upgraded to a thirty gallon capacity in 2011. The parts washer is equipped with a basin and lid, does not exceed one hundred forty-five (145) gallons per twelve (12) month total of mineral spirits. **[326 IAC 8-3-2][326 IAC 8-3-8]**

**SECTION D.1**

**EMISSION UNIT OPERATION CONDITION**

**Emissions Unit Description:**

\*\*\*

- (h) One (1) parts washer identified as PW02, constructed in 2005, upgraded to a thirty gallon capacity in 2011. The parts washer is equipped with a basin and lid, does not exceed one hundred forty-five (145) gallons per twelve (12) month total of mineral spirits. **[326 IAC 8-3-2][326 IAC 8-3-8]**

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

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

~~Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:~~

- ~~(a) Equip the cleaner with a cover;~~
- ~~(b) Equip the cleaner with a facility for draining cleaned parts;~~
- ~~(c) Close the degreaser cover whenever parts are not being handled in the cleaner;~~
- ~~(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;~~
- ~~(e) Provide a permanent, conspicuous label summarizing the operation requirements;~~
- ~~(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~

**Pursuant to 326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements):**

- (a) The Permittee shall ensure the following control equipment and operating requirements are met:**
  - (1) Equip the degreaser with a cover.**
  - (2) Equip the degreaser with a device for draining cleaned parts.**
  - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.**
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.**
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.**
  - (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) The Permittee shall ensure the following additional control equipment and operating requirements are met:**
  - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):**
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.**
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.**
    - (C) A refrigerated chiller.**
    - (D) Carbon adsorption.**
    - (E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition 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.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-58]

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~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility existing prior to January 1, 1980 shall ensure that the following control equipment requirements are met:~~

- ~~(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - ~~(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));~~
  - ~~(B) The solvent is agitated; or~~
  - ~~(C) The solvent is heated.~~~~
- ~~(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three tenths (4.3) kiloPascals (thirty two (32) millimeters of mercury or six tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~
- ~~(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~
- ~~(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~
- ~~(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three tenths (4.3) kiloPascals (thirty two (32) millimeters of mercury or six tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - ~~(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~
  - ~~(B) A water cover when solvent is used is insoluble in, and heavier than, water.~~
  - ~~(C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~~~

- ~~(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:~~
- ~~(1) Close the cover whenever articles are not being handled in the degreaser.~~
  - ~~(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~
  - ~~(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~
- (a) Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure than 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).
- (b) Pursuant to 326 IAC 8-3-8(c)(2), on and after January 1, 2015, the following records shall be maintained for each purchase of cold cleaner degreaser solvent:
- (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill dates 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).
- (c) All records required by 326 IAC 8-3-8(c)(2) shall be:
- (1) retained on-site or accessible electronically from the site for the most recent three (3) year period; and
  - (2) reasonably accessible for an additional two (2) year period.

C.11 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>Conclusion and Recommendation</b>
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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 February 13, 2014.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Administrative Amendment No. 163-34184-00097. The staff recommends to the Commissioner that this MSOP Administrative Amendment be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Donald McQuigg 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) 234-4240 or toll free at 1-800-451-6027 extension 4-4240.
- (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](http://www.in.gov/idem)

**Appendix A: Emission Summary**

**Company Name:** Clondalkin Pharma and Healthcare  
**Address City IN Zip:** 1100 E Louisiana St, Evansville, Indiana 47711  
**Operation Permit Number:** M163-30362-00097  
**Operation Permit Issuance Date:** August 10, 2011  
**Administrative Amendment Number:** 163-34184-00097  
**Reviewer:** Donald McQuigg  
**Date:** March 14, 2014

Unlimited/uncontrolled Potential Emissions (tons per year)													
Emission Units	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC	CO	NOx	GHG as CO <sub>2</sub> e	Total HAPs		Worst Case Single HAP		
Press 41	0.00	0.00	0.00	0.00	0.03	0.00	0.00	-	4.83	0.78	0.60	(xylene)	
Press 42	0.00	0.00	0.00	0.00	0.05	0.00	0.00	-					
Press 43	0.00	0.00	0.00	0.00	0.06	0.00	0.00	-					
Press 44	0.00	0.00	0.00	0.00	0.03	0.00	0.00	-					
Press 06	0.00	0.00	0.00	0.00	#REF!	0.00	0.00	-					
Press 31	0.00	0.00	0.00	0.00	#REF!	0.00	0.00	-					
Solvents (printing presses)	0.00	0.00	0.00	0.00	55.82	42.96	0.00	0.00	0.78	0.60	0.78	0.60 (xylene)	
Parts Washer (PW02)	0.00	0.00	0.00	0.00	0.05	0.00	0.00	-	0.00		0.00		
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>#REF!</b>	<b>43.17</b>	<b>0.00</b>	<b>0.00</b>	<b>-</b>	<b>5.61</b>	<b>5.43</b>	<b>3.84</b>	<b>3.66 (xylene)</b>

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

**Company Name:** Clondalkin Pharma and Healthcare  
**Address City IN Zip:** 1100 E Louisiana St, Evansville, Indiana 47711  
**Operation Permit Number:** M163-30362-00097  
**Operation Permit Issuance Date:** August 10, 2011  
**Administrative Amendment Number:** 163-34184-00097  
**Reviewer:** Donald McQuigg  
**Date:** March 14, 2014

Throughput Press I.D.	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin <sup>2</sup> /YEAR
41	415	29	75907

Ink VOCs					
Ink Name Press Id	Maxium Coverage (lbs/MMin <sup>2</sup> )	Weight % Volatiles* (less water and exempt VOCs)	Flash Off % <sup>(1)</sup>	Throughput (MMin <sup>2</sup> /Year)	VOC Emissions (tons/yr)
Oxidizing Offset Inks***	0.041837	25%	5.00%	75907	0.02
CK-3166***	0.008044	57%	5.00%	75907	0.01

Total VOC Emissions =		<b>0.03</b>	<b>Ton/yr</b>
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\*Weight % Volatiles (less water and exempt VOCs) = (weight % volatiles) - (weight % of water and exempt VOCs)

\*\*\*This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

**METHODOLOGY**

Throughput (Mmin<sup>2</sup>/year) = [Maximum Line Speed (feet/min)] \* [12 inches/foot] \* [Maximum Print Width (inches)] \* [60 min/hr] \* [8760 hrs/yr]

VOC Emissions (ton/yr) = [Maximum Coverage (lbs/MMin<sup>2</sup>)] \* [Weight % Volatiles] \* [Flash Off %] \* [Throughput (Mmin<sup>2</sup>/year)] \* [ton/2000 lbs]

Note: Heatset offset printing has an assumed flash off of 80% (20% retention). Non-heatset offset inks and oxidizing offset inks have an assumed flash off of 5% (95% retention).

Other type of printers have a flash off of 100% (0% retention).

<sup>(1)</sup> the 5% flash off factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing", EPA-453/D-95-001, pages 5-2 through 5-4.

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

**Company Name:** Clondalkin Pharma and Healthcare  
**Address City IN Zip:** 1100 E Louisiana St, Evansville, Indiana 47711  
**Operation Permit Number:** M163-30362-00097  
**Operation Permit Issuance Date:** August 10, 2011  
**Administrative Amendment Number:** 163-34184-00097  
**Reviewer:** Donald McQuigg  
**Date:** March 14, 2014

Throughput	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin <sup>2</sup> /YEAR
42	506	40	127658

Ink VOCs	Maximum Coverage (lbs/MMin <sup>2</sup> )	Weight % Volatiles* (less water and exempt VOCs)	Flash Off % <sup>(1)</sup>	Throughput (MMin <sup>2</sup> /Year)	VOC Emissions (tons/yr)
Oxidizing Offset Inks***	0.041837	25%	5.00%	127658	0.03
CK-3166***	0.008044	57%	5.00%	127658	0.01

Total VOC Emissions =	<b>0.05</b>	<b>Ton/yr</b>
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\*Weight % Volatiles (less water and exempt VOCs) = (weight % volatiles) - (weight % of water and exempt VOCs)  
 \*\*\*This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

**METHODOLOGY**

Throughput (Mmin<sup>2</sup>/year) = [Maximum Line Speed (feet/min)] \* [12 inches/foot] \* [Maximum Print Width (inches)] \* [60 min/hr] \* [8760 hrs/yr]  
 VOC Emissions (ton/yr) = [Maximum Coverage (lbs/MMin<sup>2</sup>)] \* [Weight % Volatiles] \* [Flash Off %] \* [Throughput (Mmin<sup>2</sup>/year)] \* [ton/2000 lbs]  
 Note: Heatset offset printing has an assumed flash off of 80% (20% retention). Non-heatset offset inks and oxidizing offset inks have an assumed flash off of 5% (95% retention). Other type of printers have a flash off of 100% (0% retention).

<sup>(1)</sup> the 5% flash off factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing", EPA-453/D-95-001, pages 5-2 through 5-4.

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

**Company Name:** Clondalkin Pharma and Healthcare  
**Address City IN Zip:** 1100 E Louisiana St, Evansville, Indiana 47711  
**Operation Permit Number:** M163-30362-00097  
**Operation Permit Issuance Date:** August 10, 2011  
**Administrative Amendment Number:** 163-34184-00097  
**Reviewer:** Donald McQuigg  
**Date:** March 14, 2014

Throughput	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin <sup>2</sup> /YEAR
43	583	40	147084

Ink Name Press Id	Maximum Coverage (lbs/MMin <sup>2</sup> )	Weight % Volatiles* (less water and exempt VOCs)	Flash Off % <sup>(1)</sup>	Throughput (MMin <sup>2</sup> /Year)	VOC Emissions (tons/yr)
Oxidizing Offset Inks***	0.041837	25%	5.00%	147084	0.04
CK-3166***	0.008044	57%	5.00%	147084	0.02

Total VOC Emissions =	<b>0.06</b>	<b>Ton/yr</b>
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\*Weight % Volatiles (less water and exempt VOCs) = (weight % volatiles) - (weight % of water and exempt VOCs)

\*\*\*This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

**METHODOLOGY**

Throughput (Mmin<sup>2</sup>/year) = [Maximum Line Speed (feet/min)] \* [12 inches/foot] \* [Maximum Print Width (inches)] \* [60 min/hr] \* [8760 hrs/yr]

VOC Emissions (ton/yr) = [Maximum Coverage (lbs/MMin<sup>2</sup>)] \* [Weight % Volatiles] \* [Flash Off %] \* [Throughput (Mmin<sup>2</sup>/year)] \* [ton/2000 lbs]

Note: Heatset offset printing has an assumed flash off of 80% (20% retention). Non-heatset offset inks and oxidizing offset inks have an assumed flash off of 5% (95% retention).

Other type of printers have a flash off of 100% (0% retention).

<sup>(1)</sup> the 5% flash off factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing", EPA-453/D-95-001, pages 5-2 through 5-4.

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

**Company Name:** Clondalkin Pharma and Healthcare  
**Address City IN Zip:** 1100 E Louisiana St, Evansville, Indiana 47711  
**Operation Permit Number:** M163-30362-00097  
**Operation Permit Issuance Date:** August 10, 2011  
**Administrative Amendment Number:** 163-34184-00097  
**Reviewer:** Donald McQuigg  
**Date:** March 14, 2014

Throughput	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin <sup>2</sup> /YEAR
44	415	29	75907

Ink Name Press Id	Maximum Coverage (lbs/MMin <sup>2</sup> )	Weight % Volatiles* (less water and exempt VOCs)	Flash Off % <sup>(1)</sup>	Throughput (MMin <sup>2</sup> /Year)	VOC Emissions (tons/yr)
Oxidizing Offset Inks***	0.041837	25%	5.00%	75907	0.02
CK-3166***	0.008044	57%	5.00%	75907	0.01

Total VOC Emissions =	<b>0.03</b>	<b>Ton/yr</b>
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\*Weight % Volatiles (less water and exempt VOCs) = (weight % volatiles) - (weight % of water and exempt VOCs)

\*\*\*This ink represents the worst case VOC or HAP of the hundreds of inks used by Keller Crescent Co., Inc.

**METHODOLOGY**

Throughput (Mmin<sup>2</sup>/year) = [Maximum Line Speed (feet/min)] \* [12 inches/foot] \* [Maximum Print Width (inches)] \* [60 min/hr] \* [8760 hrs/yr]

VOC Emissions (ton/yr) = [Maximum Coverage (lbs/MMin<sup>2</sup>)] \* [Weight % Volatiles] \* [Flash Off %] \* [Throughput (Mmin<sup>2</sup>/year)] \* [ton/2000 lbs]

Note: Heatset offset printing has an assumed flash off of 80% (20% retention). Non-heatset offset inks and oxidizing offset inks have an assumed flash off of 5% (95% retention).

Other type of printers have a flash off of 100% (0% retention).

<sup>(1)</sup> the 5% flash off factor reflects 95% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing", EPA-453/D-95-001, pages 5-2 through 5-4.

**Appendix A Emission Calculations  
HAPs from Printing Press Operations**

**Company Name:** Clondalkin Pharma and Healthcare  
**Address City IN Zip:** 1100 E Louisiana St, Evansville, Indiana 47711  
**Operation Permit Number:** M163-30362-00097  
**Operation Permit Issuance Date:** August 10, 2011  
**Administrative Amendment Number:** 163-34184-00097  
**Reviewer:** Donald McQuigg  
**Date:** March 14, 2014

MSDS #	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Methyl Chloroform	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methylene Chloride	Weight % Ethylene Oxide	Weight % Cumene
87	Film Kleen	6.00	55.00	0.00011	0.00%	0.00%	0.00%	0.00%	0.00%	87.22%	0.00%	0.00%	0.00%	0.00%
311	Type Wash 3565	7.26	10.00	0.00016	0.00%	0.00%	67.44%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
556	FN-6 Plate Gum	9.17	212.00	0.00011	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.00%	0.00%	0.00%	0.00%
563	SK300 Statikill	5.84	3.16	0.00011	0.00%	0.00%	0.00%	0.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%
689	Silikone Spray	8.17	6.72	0.00080	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%
817	SG Storage Gum	8.92	6.00	0.00070	1.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
1001	24726 Yellow Enamel	8.34	1.50	0.00020	10.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2058	HQ Developer/Replenisher	8.34	34.88	0.00400	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2095	FP Cleaner IV	8.34	125.00	0.01400	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%
2137	Anti-Skin Ink Spray	8.67	7.31	0.00011	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%
2246	107 Scratch Remover	8.34	12.00	0.00100	1.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%
2257	MRC Fast-Alt 7666	6.00	2420.00	0.00016	7.00%	30.00%	0.00%	0.00%	7.00%	0.00%	0.00%	0.00%	0.00%	0.00%

MSDS #	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Ethyl Benzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Chloroform Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	Ethylene Oxide Emissions (ton/yr)	Cumene Emissions (ton/yr)	Total HAPs (ton/yr)
87	Film Kleen	6.00	55.00	0.00011	0.00	0.00	0.00	0.00	0.00	0.14	0.00	0.00	0.00	0.00	<b>0.14</b>
311	Type Wash 3565	7.26	10.00	0.00016	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	<b>0.03</b>
556	FN-6 Plate Gum	9.17	212.00	0.00011	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00	<b>0.03</b>
563	SK300 Statikill	5.84	3.16	0.00011	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
689	Silikone Spray	8.17	6.72	0.00080	0.00	0.00	0.00	0.03	0.00	0.00	0.00	0.03	0.00	0.00	<b>0.06</b>
817	SG Storage Gum	8.92	6.00	0.00070	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
1001	24726 Yellow Enamel	8.34	1.50	0.00020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
2058	HQ Developer/Replenisher	8.34	34.88	0.00400	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
2095	FP Cleaner IV	8.34	125.00	0.01400	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.00	<b>0.06</b>
2137	Anti-Skin Ink Spray	8.67	7.31	0.00011	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	<b>0.01</b>
2246	107 Scratch Remover	8.34	12.00	0.00100	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
2257	MRC Fast-Alt 7666	6.00	2420.00	0.00016	0.71	3.06	0.00	0.00	0.71	0.00	0.00	0.00	0.00	0.00	<b>4.48</b>
Totals					0.72	3.06	0.03	0.03	0.71	0.15	0.03	0.03	0.06	0.00	4.83

**METHODOLOGY**

HAPs emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr\* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
VOC and HAP From Solvents Usage in Printing Press Operation**

**Company Name:** Clondalkin Pharma and Healthcare  
**Address City IN Zip:** 1100 E Louisiana St, Evansville, Indiana 47711  
**Operation Permit Number:** M163-30362-00097  
**Operation Permit Issuance Date:** August 10, 2011  
**Administrative Amendment Number:** 163-34184-00097  
**Reviewer:** Donald McQuigg  
**Date:** March 14, 2014

Throughput			
Press I.D.	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin <sup>2</sup> /YEAR
44	415	29	75907
41	415	29	75907
<del>31</del>	<del>506</del>	<del>40</del>	<del>127658</del>
42	506	40	127658
43	583	40	147084

Solvent VOCs/HAPs									
Press I.D.	Solvent I.D.	Maxium Coverage (lbs/MMin <sup>2</sup> )	Weight % Volatiles* (less water and exempt VOCs)	Flash Off % <sup>(1)</sup>	Throughput (MMin <sup>2</sup> /Year)	VOC Emissions (tons/yr)	Worst Case HAP	Worst Case Percent HAP (%)	HAP Emissions (tons/yr)
44	Quality Wash	0.201434	100%	100.00%	75907	7.65	Xylene	1.40%	0.11
41	Quality Wash	0.201434	100%	100.00%	75907	7.65	Xylene	1.40%	0.11
<del>31</del>	<del>Quality Wash</del>	<del>0.201434</del>	<del>100%</del>	<del>100.00%</del>	<del>127658</del>	<del>12.86</del>	<del>Xylene</del>	<del>1.40%</del>	<del>0.18</del>
42	Quality Wash	0.201434	100%	100.00%	127658	12.86	Xylene	1.40%	0.18
43	Quality Wash	0.201434	100%	100.00%	147084	14.81	Xylene	1.40%	0.21
Totals						<del>55.92</del>			<del>0.78</del>
						<b>42.96</b>			<b>0.60</b>

\*Weight % Volatiles (less water and exempt VOCs) = (weight % volatiles) - (weight % of water and exempt VOCs)

**METHODOLOGY:**

Throughput (Mmin<sup>2</sup>/year) = [Maximum Line Speed (feet/min)] \* [12 inches/foot] \* [Maximum Print Width (inches)] \* [60 min/hr] \* [8760 hrs/yr]  
VOC Emissions (ton/yr) = [Maximum Coverage (lbs/MMin<sup>2</sup>)] \* [Weight % Volatiles] \* [Flash Off %] \* [Throughput (Mmin<sup>2</sup>/year)] \* [ton/2000 lbs]  
HAP Emissions (tons/yr) = [VOC Emissions (ton/yr)] \* [Worst Case Percent HAP (%)]

Note: Heatset offset printing has an assumed flash off of 80% (20% retention). Non-heatset offset inks and oxidizing offset inks have an assumed flash off of 5% (95% retention). Other type of printers have a flash off of 100% (0% retention).

<sup>(1)</sup> the 100% flash off factor reflects 0% retention as documented in the CTG document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing", EPA-453/D-95-001, pages 5-2 through 5-4.

**Appendix A: Emissions Calculations  
Parts Washer (PW02) VOC Emissions**

**Company Name:** Clondalkin Pharma and Healthcare  
**Address City IN Zip:** 1100 E Louisiana St, Evansville, Indiana 47711  
**Operation Permit Number:** M163-30362-00097  
**Operation Permit Issuance Date:** August 10, 2011  
**Administrative Amendment Number:** 163-34184-00097  
**Reviewer:** Donald McQuigg  
**Date:** March 14, 2014

**POTENTIAL EMISSIONS**

Wash Solution Tank Size	30	gallons
Solution Life	13	weeks
Annual Wash Solution Usage	120	gallons/yr
Percent VOC in Wash Solution	100.00%	
Annual VOC Usage	120	gallons/yr
VOC Density	0.78	lbs/gal
VOC Emission	93.60	lbs/yr
VOC Emission	0.05	tons/yr

**METHODOLOGY**

Annual Wash Solution Usage (gallons/yr) = [Wash Solution Tank Size (gallons)] / [Solution Life (weeks)] \* [52 weeks/year]

Annual VOC Usage (gallons/yr) = [Annual Wash Solution Usage (gallons/yr)] \* [Percent VOC in Wash Solution]

VOC Emission (lbs/yr) = [Annual VOC Usage (gallons/yr)] \* [VOC Density (lbs/gal)]

VOC Emission (tons/yr) = [VOC Emission (lbs/yr)] \* [ton/2000 lbs]

Wash solution is Mineral Spirits



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

**TO:** Betty Lantaff  
Clondalkin Pharma & Healthcare  
1100 East Louisiana Street  
Evansville, IN 47711

**DATE:** March 31, 2014

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

**SUBJECT:** Final Decision  
Administrative Amendment to MSOP  
163-34184-00097

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:  
Chris Feagans, Responsible Official  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	PWAY 3/31/2014 Clondalkin Pharma and Healthcare 163-34184-00097 (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:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Betty Lantaff Clondalkin Pharma and Healthcare 1100 E Louisiana St Evansville IN 47711 (Source CAATS)										
2		Chris Feagans Exec VP Production & Operating Svcs Clondalkin Pharma and Healthcare 1100 E Louisiana St Evansville IN 47711 (RO CAATS)										
3		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 (Local Official)										
4		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)										
5		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 (Health Department)										
6		Kim Sherman 3355 Woodview Drive Newburgh IN 47630 (Affected Party)										
7		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)										
8		Evansville EPA 100 E. Walnut St. Suite 100, Newsome Center Evansville IN 47713 (Local Official)										
9		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)										
10		Melinda Paul HSMF, LLC 12835 Saint Wendel Road Evansville IN 47720 (Affected Party)										
11		John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
12												
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