

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
and
OFFICE OF AIR MANAGEMENT
and
Vigo County Air Pollution Control**

**Standard Register Company
1251 North Fruitridge Avenue
Terre Haute, Indiana 47808**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F167-7790-00060	
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date:

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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 Management (OAM) and Vigo County Air Pollution Control (VCAPC), and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a flexographic printing operation.

Responsible Official: George Stubbs
Source Address: 1251 North Fruitridge, Terre Haute, Indiana 47808
Mailing Address: Same as Source Address
SIC Code: 2761
County Location: Vigo
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Major Source, under Emission Offset Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

1. One (1) web press (Model MPDC108) which is identified as P4. This press was installed in 1981.
2. One (1) web press (Model MPDC108) which is identified as P5. This press was installed in 1981.
3. One (1) web press (Model 90-1232) which is identified as P19. This press was installed in 1991.
4. One (1) web press (Model 88-1232) which is identified as P21. This press was installed in 1994.
5. One (1) web press (Model 88-1242) which is identified as P20. This press was installed in 1990.
6. One (1) web press (Model 89-1241) which is identified as P18. This press was installed in 1990.
7. One (1) web press (Model 87-1225) which is identified as P16. This press was installed in 1989.
8. One (1) web press (Model 88-1234) which is identified as P17. This press was installed in 1989.
9. One (1) web press (Model 85-1637) which is identified as P15. This press was installed in 1987.
10. One (1) web press (Model 90-1255) which is identified as PB1. This press was installed in 1993.
11. One (1) web press (Model 390-4598) which is identified as PS1. This press was installed in 1996.
12. One (1) web press (Model 88-1233-D1) which is identified as P22. This press was installed in 1995.
13. One (1) web press (Model 92-1228) which is identified as P23. This press was installed in 1996.

14. One (1) web press (Model 85-1638) which is identified as P39. This press was installed in 1987.
15. One (1) web press (Model 2C108) which is identified as P2. This press was installed in 1978.
16. One (1) web press (Model 2C108) which is identified as P3. This press was installed in 1979.
17. One (1) web press which is identified as Pkluge. This press is only utilized for rewinding of printed roll stock. Therefore, it cannot be used in any capacity that would generate emissions.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (3) Paved and unpaved roads and parking lots with public access.
- (4) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.

NOTE: The CYREL plate processing unit is used to produce all of the Flexographic plates used at the facility. Production from this unit is 2 plates in 2.5 hours. The process is a closed loop operation in which the solvent (CYREL Washout Solution) is only exposed during installation and removal of a plate from the processor unit. The solvent is replenished continuously at a rate of 6.8 pounds/hour during operation and the used solvent is recycled. The actual solvent losses during processing amount to 4% by weight. These emissions are fugitive. Fugitive VOC emissions are 0.27 pounds/hour. The solvent is 75 wt% Perchloroethylene. Waste solvent is manifested for offsite disposal.

A conversation was held with an IDEM, OAM engineer who stated that Standard Register could receive credit for recycling and would have to count only the 4 wt% not recycled towards potential emissions.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Vigo County Air Pollution Control (VCAPC) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and VCAPC.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by VCAPC.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]

- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana 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 FESOP under 326 IAC 2-8.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47808

- (b) The Permittee shall furnish to IDEM, OAM, and VCAPC within a reasonable time, any information that IDEM, OAM, and VCAPC 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and VCAPC copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, and VCAPC along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM and VCAPC).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM and VCAPC may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(I)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47808

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and VCAPC on or before the date it is due. [326 IAC 2-5-3]
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, VCAPC may require to determine the compliance status of the source.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMP) within ninety (90) days after the issuance of this permit, including the following information on each:
- (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;
 - (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;

- (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) PMPs shall be submitted to IDEM, OAM and VCAPC, upon request and shall be subject to review and approval by IDEM, OAM and VCAPC.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM and VCAPC, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

VCAPC

Telephone No.: 812-462-3433

Facsimile No.: 812-462-3447

Failure to notify IDEM, OAM and VCAPC, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47808

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM and VCAPC, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM and VCAPC, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47808

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms or their substantial equivalent.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM and VCAPC determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM and VCAPC, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM and VCAPC, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and VCAPC, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and VCAPC and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47808

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) Delivered by any method and received and stamped by IDEM, OAM and VCAPC, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM and VCAPC upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 2-8 until IDEM, OAM 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 in writing by IDEM, OAM and VCAPC, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).

- (b) An administrative permit amendment may be made by IDEM, OAM and VCAPC, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM and VCAPC takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(I) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47808

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM and VCAPC, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) For each such change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;

- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.24 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM and VCAPC, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and VCAPC, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM, OAM and VCAPC shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM and VCAPC, consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM and VCAPC or in a time period that is consistent with the payment schedule issued by IDEM, OAM and VCAPC.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2(Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2 (4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is/are in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]
[40 CFR 61, Subpart M]**

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be Indiana accredited is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-2.1]

All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by the IDEM, OAM and VCAPC.

The test protocol shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47808

no later than thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47808

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (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) Written notification is to be 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
 - (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47808

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Corrective Actions [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance is present in more than the threshold quantity that is subject to 40 CFR 68, 40 CFR 68 is an applicable requirement, and the Permittee shall:

(a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM and VCAPC that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM and VCAPC that the Risk Management Plan is being properly implemented.

C.13 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

- (1) This condition;
- (2) The Compliance Determination Requirements in Section D of this permit;
- (3) The Compliance Monitoring Requirements in Section D of this permit;
- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.

- (b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied;
or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit, exceed the level specified in any condition of this permit, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM and VCAPC within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM and VCAPC that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and VCAPC reserve the right to utilize enforcement activities to resolve the non-compliant stack test.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted

to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47808

- (b) This annual emission statement required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and VCAPC on or before the date it is due. [326 IAC 2-5-3]

C.16 Monitoring Data Availability

- (a) All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) When the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and VCAPC may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information 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 kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM and VCAPC representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;

- (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47808
- (c) 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, OAM, and VCAPC on or before the date it is due.
- (d) Unless otherwise specified in this permit any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement

of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule of limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

1. One (1) web press (Model MPDC108) which is identified as P4. This press was installed in 1981.
2. One (1) web press (Model MPDC108) which is identified as P5. This press was installed in 1981.
3. One (1) web press (Model 90-1232) which is identified as P19. This press was installed in 1991.
4. One (1) web press (Model 88-1232) which is identified as P21. This press was installed in 1994.
5. One (1) web press (Model 88-1242) which is identified as P20. This press was installed in 1990.
6. One (1) web press (Model 89-1241) which is identified as P18. This press was installed in 1990.
7. One (1) web press (Model 87-1225) which is identified as P16. This press was installed in 1989.
8. One (1) web press (Model 88-1234) which is identified as P17. This press was installed in 1989.
9. One (1) web press (Model 85-1637) which is identified as P15. This press was installed in 1987.
10. One (1) web press (Model 90-1255) which is identified as PB1. This press was installed in 1993.
11. One (1) web press (Model 390-4598) which is identified as PS1. This press was installed in 1996.
12. One (1) web press (Model 88-1233-D1) which is identified as P22. This press was installed in 1995.
13. One (1) web press (Model 92-1228) which is identified as P23. This press was installed in 1996.
14. One (1) web press (Model 85-1638) which is identified as P39. This press was installed in 1987.
15. One (1) web press (Model 2C108) which is identified as P2. This press was installed in 1978.
16. One (1) web press (Model 2C108) which is identified as P3. This press was installed in 1979.
17. One (1) web press which is identified as Pkluge. This press is only utilized for rewinding of printed roll stock. Therefore, it cannot be used in any capacity that would generate emissions.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC)

That the VOC emissions from all the presses combined shall not exceed 99 tons per twelve (12) month consecutive period. Therefore, the requirements of 326 IAC 2-7, 326 IAC 8-5-5, and 326 IAC 8-6-1 do not apply.

D.1.2 VOC [326 IAC 8-1-6]

Any change or modification, except items 15 and 16, which may increase the potential emissions to 25 tons per year or more from the equipment listed above, would require prior approval from IDEM and VCAPC.

D.1.3 Hazardous Air Pollutants

That the hazardous air pollutant emissions from all the presses combined shall not exceed 9.0 tons per year for any single HAP and/or 24 tons per year for any combination of HAP's rolled monthly. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM and VCAPC reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in

326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Hazardous Air Pollutant (HAP)

That the permittee shall maintain records at the facility of the materials used that contain any HAPs. Their records shall be complete and sufficient to establish compliance with the HAP usage limits and HAP emission limits that may be established in this permit. The records shall contain a minimum of the following:

- (1) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- (2) The HAP content (weight percent) of each material used;
- (3) Identification of the facility or facilities associated with the usage of each HAP; and
- (4) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.3, shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Standard Register Company
Source Address: 1251 North Fruitridge, Terre Haute, Indiana 47808
Mailing Address: P.O. Box 3707, Terre Haute, Indiana 47803-0707
FESOP No.: F 167-7790-00060

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORT**

Source Name: Standard Register Company
Source Address: 1251 North Fruitridge, Terre Haute, Indiana 47808
Mailing Address: P.O. Box 3707, Terre Haute, Indiana 47803-0707
FESOP No.: F 167-7790-00060

If a deviation has occurred a separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit . Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
9 Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
9 Permit Has No Content Limitations for this Parameter.
Comments:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 VIGO COUNTY AIR POLLUTION CONTROL**

FESOP Monthly Report

Source Name: Standard Register Company
 Source Address: 1251 North Fruitridge, Terre Haute, Indiana 47808
 Mailing Address: P.O. Box 3707, Terre Haute, Indiana 47803-0707
 FESOP No.: F167-7790-0060
 Facility: All printing presses combined
 Parameter: VOC emission limitation
 Limit: 99 tons per twelve (12) month consecutive period

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9No deviation occurred in any of these months.
 Deviation/s occurred in month 1 9, month 2 9, and/or month 3 9.

Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

FESOP Monthly Report

Source Name: Standard Register Company
Source Address: 1251 North Fruitridge, Terre Haute, Indiana 47808
Mailing Address: P.O. Box 3707, Terre Haute, Indiana 47803-0707
FESOP No.: F167-7790-0060
Facility: All printing presses combined
Parameter: HAP emission limitation
Limit: 9.0 tons per twelve (12) month consecutive period for a specific HAP, or 24 tons per twelve (12) month consecutive period for any combination of HAPS.

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9No deviation occurred in any of these months.
Deviation/s occurred in month 1 9, month 2 9, and/or month 3 9.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

**Indiana Department of Environmental Management
Office of Air Management
and
Vigo County Air Pollution Control**

**Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)**

Source Background And Description

Source Name: Standard Register Company
Source Location: 1251 North Fruitridge Avenue, Terre Haute, Indiana 47808
County: Vigo
Operation Permit No.: F167-7790-00060
Permit Reviewer: Darren Woodward

Vigo County Air Pollution Control (VCAPC) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Standard Register Company relating to the operation of flexographic printing presses.

The source consists of the following approvals (permits, registrations, exemptions, etc.) with the following emission units and pollution control devices:

Standard Register operates fourteen (14) Flexographic printing presses, which consist of the following twelve (12) web presses and one (1) letter press:

1. One (1) web press (Model MPDC108) which is identified as P4. This press was installed in 1981.
2. One (1) web press (Model MPDC108) which is identified as P5. This press was installed in 1981.
3. One (1) web press (Model 90-1232) which is identified as P19. This press was installed in 1991.
4. One (1) web press (Model 88-1232) which is identified as P21. This press was installed in 1994.
5. One (1) web press (Model 88-1242) which is identified as P20. This press was installed in 1990.
6. One (1) web press (Model 89-1241) which is identified as P18. This press was installed in 1990.
7. One (1) web press (Model 87-1225) which is identified as P16. This press was installed in 1989.
8. One (1) web press (Model 88-1234) which is identified as P17. This press was installed in 1989.
9. One (1) web press (Model 85-1637) which is identified as P15. This press was installed in 1987.
10. One (1) web press (Model 90-1255) which is identified as PB1. This press was installed in 1993.
11. One (1) web press (Model 390-4598) which is identified as PS1. This press was installed in 1996.

12. One (1) web press (Model 88-1233-D1) which is identified as P22. This press was installed in 1995.
13. One (1) web press (Model 92-1228) which is identified as P23. This press was installed in 1996.
14. One (1) web press (Model 85-1638) which is identified as P39. This press was installed in 1987.
15. One (1) web press (Model 2C108) which is identified as P2. This press was installed in 1978.
16. One (1) web press (Model 2C108) which is identified as P3. This press was installed in 1979.
17. One (1) web press which is identified as Pkluge. This press is only utilized for rewinding of printed roll stock. Therefore, it cannot be used in any capacity that would generate emissions.

The source also includes the following insignificant activities:

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (3) Paved and unpaved roads and parking lots with public access.
- (4) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.

NOTE: The CYREL plate processing unit is used to produce all of the Flexographic plates used at the facility. Production from this unit is 2 plates in 2.5 hours. The process is a closed loop operation in which the solvent (CYREL Washout Solution) is only exposed during installation and removal of a plate from the processor unit. The solvent is replenished continuously at a rate of 6.8 pounds/hour during operation and the used solvent is recycled. The actual solvent losses during processing amount to 4% by weight. These emissions are fugitive. Fugitive VOC emissions are 0.27 pounds/hour. The solvent is 75 wt% Perchloroethylene. Waste solvent is manifested for offsite disposal.

A conversation was held with an IDEM, OAM engineer who stated that Standard Register could receive credit for recycling and would have to count only the 4 wt% not recycled towards potential emissions.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

A complete FESOP application for the purposes of this review was received on December 13, 1996, with latest additional information being received on October 24, 1997.

Potential to Emit (PTE) Calculations

See Appendix A Potential to Emit (PTE) Calculation for detailed calculations.

Total PTE Emissions

PTE is defined as “the maximum capacity of a stationary source to emit a pollutant under its physical and operational design, and running flat-out, 24 hours a day, 365 days a year.

Pollutant	PTE (tons/year)
PM	0.0
SO ₂	0.0
VOC	204
CO	0.0
NO _x	0.0

HAP	PTE (tons/year)
Methylene Chloride	16.4
Styrene	14.3
Toluene	28.7
TOTAL	59.4

Potential emissions (as defined in the Indiana Rule) of (pollutant) are greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7-1.

A source with “potential to emit” high enough to make it a “major source” but whose actual emissions are below the Part 70 emission levels may elect to avoid the Part 70 Operating Permit Program by agreeing to accept a permit with federally enforceable limits that restrict its PTE to below the major source emission levels. The permit containing these restrictions is called a Federally Enforceable State Operating Permit (FESOP).

The source has accepted a federally enforceable VOC limit of 99 tons per year.

The source has accepted HAP limit of 9.4 tons per year and or 24 tons per year for any HAP combination.

County Attainment Status

The source is located in Vigo County.

Pollutant	Status (attainment/ severe, moderate, marginal, or maintenance nonattainment)
PM	attainment
SO ₂	attainment
VOC	attainment
CO	attainment
NO _x	attainment

FESOP Conditions

The source has been given a Federally Enforceable limit of 99 tons per year.

and

The source has been given a limit of 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs.

	Limited Emissions (tons/year)					
Process/ facility	PM	SO2	VOC	CO	NOx	HAPS
All Press Combined			99			24

Attached Tables (1) to (2) summarize the permit conditions and requirements.

Federal Rule Applicability

The printing presses are not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.430 and 60.580, Subpart QQ and FFF), because Standard Register Company does flexographic printing, not rotogravure.

State Rule Applicability

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 8-5-5 (Graphic Arts Operations)

Standard Register Company is not subject to this rule because the source has accepted a federally enforceable limit of 99 tons per 365 days consecutive day period. Therefore, 326 IAC 8-6-1 does not apply.

326 IAC 8-6-1 (Organic Solvent Emission Limitations)

Standard Register Company is not subject to this rule because the source has accepted a federally enforceable limit of 99 tons per 365 consecutive day period. Therefore, 326 IAC 8-6-1 does not apply.

326 IAC 8-1-6 (New facilities)

Standard Register Company is not subject to this rule because the new facilities (as of January 1, 1980) potential emissions are below the 25 tons per year limit. Therefore, 326 IAC 8-1-6 does not apply.

Compliance Monitoring

1. The printing presses have applicable compliance monitoring conditions as specified below:
 - a. That the VOC input to all the printing presses combined shall not exceed 99 tons per year (365 day rolling total). A report showing daily information to document compliance with this limitation shall be submitted quarterly.
 - b. That the combined input of any single HAP from the entire source shall not exceed 9 tons per year. A report showing daily information to document compliance with this limitation shall be submitted quarterly.
 - c. That the combined HAP input from the entire source shall not exceed 24 tons per year (365 day rolling total). A report showing daily information to document compliance with this limitation shall be submitted quarterly.

These monitoring conditions are necessary in order to avoid the requirements of 326 IAC 2-7.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 189 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application GSD-08. This source has accepted federally enforceable air toxic emission limits of 9.4 tons per year for any single HAP and/or 24 tons per year for any combination of HAPs.

Conclusion

The operation of the flexographic printing presses will be subject to the conditions of the attached proposed **FESOP No. F167-7790-00060**.

Table (1)

Stack/Vent ID:	S22			
Stack/Vent Dimensions:	Ht: 22	Dia: 0.83	Temp: 150	Flow: 1,000
Emission Unit:	Printing Presses 22 & 23			
Date of Construction:	Press 22 was installed in 1995 and Press 23 was installed in 1996.			
Alternative Scenario:	NA			
Pollution Control Equipment:	None			
Numerical Emission Limit:	99 tons per year VOC limit for all presses combined.			
Regulation/Citation:	326 IAC 2-8			
Compliance Demonstration:	Record Keeping and Reporting Requirements			
PERFORMANCE TESTING				
Parameter/Pollutant to be Tested:	NA			
Testing Method/Analysis:	NA			
Testing Frequency/Schedule:	NA			
Submittal of Test Results:	NA			
COMPLIANCE MONITORING				
Monitoring Description:	Formulation data supplied by the coating manufacturer.			
Monitoring Method:	Method 24 of 40 CFR 60, and daily volume-weighted average.			
Monitoring Regulation/Citation:	326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7)			
Monitoring Frequency:	daily			
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	VOC			
Recording Frequency:	daily			
REPORTING REQUIREMENTS				
Information in Report:	Summary of the information to document compliance with Conditions D.12.1 and D.12.2 (VOC and HAPs emission limitations).			
Reporting Frequency/Submittal:	Submitted within 30 days after the end of the quarter being reported.			
Additional Comments:	Preventive Maintenance Plan required.			

Stack/Vent ID:	S139			
Stack/Vent Dimensions:	Ht: 26	Dia: 1.10	Temp: 350	Flow: 2,125
Emission Unit:	Printing Press 39			
Date of Construction:	Press 39 was installed in 1987.			
Alternative Scenario:	NA			
Pollution Control Equipment:	None			
Numerical Emission Limit:	99 tons per year VOC limit for all presses combined.			
Regulation/Citation:	326 IAC 2-8			
Compliance Demonstration:	Record Keeping and Reporting Requirements			
PERFORMANCE TESTING				
Parameter/Pollutant to be Tested:	NA			
Testing Method/Analysis:	NA			
Testing Frequency/Schedule:	NA			
Submittal of Test Results:	NA			
COMPLIANCE MONITORING				
Monitoring Description:	Formulation data supplied by the coating manufacturer.			
Monitoring Method:	Method 24 of 40 CFR 60, and daily volume-weighted average.			
Monitoring Regulation/Citation:	326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7)			
Monitoring Frequency:	daily			
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	VOC			
Recording Frequency:	daily			
REPORTING REQUIREMENTS				
Information in Report:	Summary of the information to document compliance with Conditions D.12.1 and D.12.2 (VOC and HAPs emission limitations).			
Reporting Frequency/Submittal:	Submitted within 30 days after the end of the quarter being reported.			
Additional Comments:	Preventive Maintenance Plan required.			

Appendix A: Emissions Calculations
 VOC From Printing Press Operations

Company Name: Standard Register Company
 Address City IN Zip: 1251 North Fruitridge Avenue, Terre Haute, IN 47808
 CP: F 167-7790
 Plt ID: 167-00060
 Reviewer: Darren Woodward
 Date: September 26, 1997

THROUGHPUT Press I.D.	MAXIMUM LINE SPEED FEET/MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000 MMin^2/YEAR
P4	500	12	10	60	8760	1000000 31536

INK VOCS Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.1	59%	49%	100.00%	31536	2000	3.31
Water Brite System	2.1	49%	35%	100.00%	31536	2000	4.64
Water Gloss Ink	2.15	63%	58%	100.00%	31536	2000	1.58
Water Heat Resistant	2.19	57%	55%	100.00%	31536	2000	0.50
Water Litho System	2.18	59%	49%	100.00%	31536	2000	3.30
Aqua Spec Label Inks	2.01	26%	25%	100.00%	31536	2000	0.32
Aqua Spec Metallic Inks	2.24	21%	20%	100.00%	31536	2000	0.35
Aqua Spec Heat Resist Ink	2.01	27%	25%	100.00%	31536	2000	0.63
Aqua Spec Fluorescent Ink	2.01	45%	35%	100.00%	31536	2000	3.17
Aqua Gloss Black	2.13	53%	51%	100.00%	31536	2000	0.45
Laser Lock	5.67	57%	56%	100.00%	31536	2000	0.49
Flexo WB-CF	1.82	51%	50%	100.00%	31536	2000	0.24

Total VOC = 1 (Water Brite System floodcoat) + 3 (Water Brite System @ 10%) + Solvents = 6.03 tons/yr

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN A5 FLASH OFF OF 80%. OTHER TYPE OF PRINTERS HAVE A FLASH OFF OF 100%

Press I.D.	MAXIMUM LINE SPEED FEET/MIN	CONVERT FEET TO INCHES		MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin^2/YEAR
P5	500	12		10	60	8760	1000000	31536

INK VOCS Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.1	59%	49%	100.00%	31536	2000	3.31
Water Brite System	2.1	49%	35%	100.00%	31536	2000	4.64
Water Gloss Ink	2.15	63%	58%	100.00%	31536	2000	1.58
Water Heat Resistant	2.19	57%	55%	100.00%	31536	2000	0.50
Water Litho System	2.18	59%	49%	100.00%	31536	2000	3.30
Aqua Spec Label Inks	2.01	26%	25%	100.00%	31536	2000	0.32
Aqua Spec Metallic Inks	2.24	21%	20%	100.00%	31536	2000	0.35
Aqua Spec Heat Resist Ink	2.01	27%	25%	100.00%	31536	2000	0.63
Aqua Spec Fluorescent Ink	2.01	45%	35%	100.00%	31536	2000	3.17
Aqua Gloss Black	2.13	53%	51%	100.00%	31536	2000	0.45
Laser Lock	5.67	57%	56%	100.00%	31536	2000	0.49
Flexo WB-CF	1.82	51%	50%	100.00%	31536	2000	0.24

Total VOC = 1 (Water Brite System floodcoat) + 3 (Water Brite System @ 10%) + Solvents = 6.03

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

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

Press I.D.	MAXIMUM LINE SPEED FEET/MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000 MMin^2/YEAR
P19	500	12	16	60	8760	1000000 50458

INK VOCS Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.1	59%	49%	100.00%	50458	2000	5.30
Water Brite System	2.1	49%	35%	100.00%	50458	2000	7.42
Water Gloss Ink	2.15	63%	58%	100.00%	50458	2000	2.53
Water Heat Resistant	2.19	57%	55%	100.00%	50458	2000	0.81
Water Litho System	2.18	59%	49%	100.00%	50458	2000	5.28
Aqua Spec Label Inks	2.01	26%	25%	100.00%	50458	2000	0.51
Aqua Spec Metallic Inks	2.24	21%	20%	100.00%	50458	2000	0.57
Aqua Spec Heat Resist Ink	2.01	27%	25%	100.00%	50458	2000	1.01
Aqua Spec Fluorescent Ink	2.01	45%	35%	100.00%	50458	2000	5.07
Aqua Gloss Black	2.13	53%	51%	100.00%	50458	2000	0.72
Laser Lock	5.67	57%	56%	100.00%	50458	2000	0.79
Flexo WB-CF	1.82	51%	50%	100.00%	50458	2000	0.39

Total VOC = 1 (Water Brite System floodcoat) + 3 (Water Brite System @ 10%) + Solvents = 9.64

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

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

Press I.D.	MAXIMUM LINE SPEED FEET/MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000 MMin^2/YEAR
P21	500	12	18	60	8760	1000000 56765

INK VOCS Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.1	59%	49%	100.00%	56765	2000	5.96
Water Brite System	2.1	49%	35%	100.00%	56765	2000	8.34
Water Gloss Ink	2.15	63%	58%	100.00%	56765	2000	2.84
Water Heat Resistant	2.19	57%	55%	100.00%	56765	2000	0.91
Water Litho System	2.18	59%	49%	100.00%	56765	2000	5.94
Aqua Spec Label Inks	2.01	26%	25%	100.00%	56765	2000	0.57
Aqua Spec Metallic Inks	2.24	21%	20%	100.00%	56765	2000	0.64
Aqua Spec Heat Resist Ink	2.01	27%	25%	100.00%	56765	2000	1.14
Aqua Spec Fluorescent Ink	2.01	45%	35%	100.00%	56765	2000	5.70
Aqua Gloss Black	2.13	53%	51%	100.00%	56765	2000	0.81
Laser Lock	5.67	57%	56%	100.00%	56765	2000	0.89
Flexo WB-CF	1.82	51%	50%	100.00%	56765	2000	0.44

Total VOC = 1 (Water Brite System floodcoat) + 4 (Water Brite System @ 10%) + Solvents = 11.68

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

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

Press I.D.	MAXIMUM LINE SPEED FEET/MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000 MMin^2/YEAR
P20	500	12	16	60	8760	1000000 50458

INK VOCS Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.1	59%	49%	100.00%	50458	2000	5.30
Water Brite System	2.1	49%	35%	100.00%	50458	2000	7.42
Water Gloss Ink	2.15	63%	58%	100.00%	50458	2000	2.53
Water Heat Resistant	2.19	57%	55%	100.00%	50458	2000	0.81
Water Litho System	2.18	59%	49%	100.00%	50458	2000	5.28
Aqua Spec Label Inks	2.01	26%	25%	100.00%	50458	2000	0.51
Aqua Spec Metallic Inks	2.24	21%	20%	100.00%	50458	2000	0.57
Aqua Spec Heat Resist Ink	2.01	27%	25%	100.00%	50458	2000	1.01
Aqua Spec Fluorescent Ink	2.01	45%	35%	100.00%	50458	2000	5.07
Aqua Gloss Black	2.13	53%	51%	100.00%	50458	2000	0.72
Laser Lock	5.67	57%	56%	100.00%	50458	2000	0.79
Flexo WB-CF	1.82	51%	50%	100.00%	50458	2000	0.39

Total VOC = 1 (Water Brite System floodcoat) + 3 (Water Brite System @ 10%) + Solvents = 9.64

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

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

Press I.D.	MAXIMUM LINE SPEED FEET/MIN	CONVERT FEET TO INCHES		MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000 MMin^2/YEAR	
P18	500	12		16	60	8760	1000000	50458

INK VOCS Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.1	59%	49%	100.00%	50458	2000	5.30
Water Brite System	2.1	49%	35%	100.00%	50458	2000	7.42
Water Gloss Ink	2.15	63%	58%	100.00%	50458	2000	2.53
Water Heat Resistant	2.19	57%	55%	100.00%	50458	2000	0.81
Water Litho System	2.18	59%	49%	100.00%	50458	2000	5.28
Aqua Spec Label Inks	2.01	26%	25%	100.00%	50458	2000	0.51
Aqua Spec Metallic Inks	2.24	21%	20%	100.00%	50458	2000	0.57
Aqua Spec Heat Resist Ink	2.01	27%	25%	100.00%	50458	2000	1.01
Aqua Spec Fluorescent Ink	2.01	45%	35%	100.00%	50458	2000	5.07
Aqua Gloss Black	2.13	53%	51%	100.00%	50458	2000	0.72
Laser Lock	5.67	57%	56%	100.00%	50458	2000	0.79
Flexo WB-CF	1.82	51%	50%	100.00%	50458	2000	0.39

Total VOC = 1 (Water Brite System floodcoat) + 4 (Water Brite System @ 10%) + Solvents = 10.38

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

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

Press I.D.	MAXIMUM LINE SPEED FEET/MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000 MMin^2/YEAR
P16	500	12	16	60	8760	1000000 50458

INK VOCS Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.1	59%	49%	100.00%	50458	2000	5.30
Water Brite System	2.1	49%	35%	100.00%	50458	2000	7.42
Water Gloss Ink	2.15	63%	58%	100.00%	50458	2000	2.53
Water Heat Resistant	2.19	57%	55%	100.00%	50458	2000	0.81
Water Litho System	2.18	59%	49%	100.00%	50458	2000	5.28
Aqua Spec Label Inks	2.01	26%	25%	100.00%	50458	2000	0.51
Aqua Spec Metallic Inks	2.24	21%	20%	100.00%	50458	2000	0.57
Aqua Spec Heat Resist Ink	2.01	27%	25%	100.00%	50458	2000	1.01
Aqua Spec Fluorescent Ink	2.01	45%	35%	100.00%	50458	2000	5.07
Aqua Gloss Black	2.13	53%	51%	100.00%	50458	2000	0.72
Laser Lock	5.67	57%	56%	100.00%	50458	2000	0.79
Flexo WB-CF	1.82	51%	50%	100.00%	50458	2000	0.39

Total VOC = 1 (Water Brite System floodcoat) + 4 (Water Brite System @ 10%) + Solvents = 10.38

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

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

Press I.D.	MAXIMUM LINE SPEED FEET/MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000 MMin^2/YEAR
P17	500	12	18	60	8760	1000000 56765

INK VOCS Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.1	59%	49%	100.00%	56765	2000	5.96
Water Brite System	2.1	49%	35%	100.00%	56765	2000	8.34
Water Gloss Ink	2.15	63%	58%	100.00%	56765	2000	2.84
Water Heat Resistant	2.19	57%	55%	100.00%	56765	2000	0.91
Water Litho System	2.18	59%	49%	100.00%	56765	2000	5.94
Aqua Spec Label Inks	2.01	26%	25%	100.00%	56765	2000	0.57
Aqua Spec Metallic Inks	2.24	21%	20%	100.00%	56765	2000	0.64
Aqua Spec Heat Resist Ink	2.01	27%	25%	100.00%	56765	2000	1.14
Aqua Spec Fluorescent Ink	2.01	45%	35%	100.00%	56765	2000	5.70
Aqua Gloss Black	2.13	53%	51%	100.00%	56765	2000	0.81
Laser Lock	5.67	57%	56%	100.00%	56765	2000	0.89
Flexo WB-CF	1.82	51%	50%	100.00%	56765	2000	0.44

Total VOC = 1 (Water Brite System floodcoat) + 6 (Water Brite System @ 10%) + Solvents = 13.35

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

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

Press I.D.	MAXIMUM LINE SPEED FEET/MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000 MMin^2/YEAR
P15	500	12	16	60	8760	1000000 50458

INK VOCS Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.1	59%	49%	100.00%	50458	2000	5.30
Water Brite System	2.1	49%	35%	100.00%	50458	2000	7.42
Water Gloss Ink	2.15	63%	58%	100.00%	50458	2000	2.53
Water Heat Resistant	2.19	57%	55%	100.00%	50458	2000	0.81
Water Litho System	2.18	59%	49%	100.00%	50458	2000	5.28
Aqua Spec Label Inks	2.01	26%	25%	100.00%	50458	2000	0.51
Aqua Spec Metallic Inks	2.24	21%	20%	100.00%	50458	2000	0.57
Aqua Spec Heat Resist Ink	2.01	27%	25%	100.00%	50458	2000	1.01
Aqua Spec Fluorescent Ink	2.01	45%	35%	100.00%	50458	2000	5.07
Aqua Gloss Black	2.13	53%	51%	100.00%	50458	2000	0.72
Laser Lock	5.67	57%	56%	100.00%	50458	2000	0.79
Flexo WB-CF	1.82	51%	50%	100.00%	50458	2000	0.39

Total VOC = 1 (Water Brite System floodcoat) + 4 (Water Brite System @ 10%) + Solvents = 10.38

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

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

Press I.D.	MAXIMUM LINE SPEED FEET/MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000 MMin^2/YEAR
P39	500	12	16	60	8760	1000000 50458

INK VOCS Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.1	59%	49%	100.00%	50458	2000	5.30
Water Brite System	2.1	49%	35%	100.00%	50458	2000	7.42
Water Gloss Ink	2.15	63%	58%	100.00%	50458	2000	2.53
Water Heat Resistant	2.19	57%	55%	100.00%	50458	2000	0.81
Water Litho System	2.18	59%	49%	100.00%	50458	2000	5.28
Aqua Spec Label Inks	2.01	26%	25%	100.00%	50458	2000	0.51
Aqua Spec Metallic Inks	2.24	21%	20%	100.00%	50458	2000	0.57
Aqua Spec Heat Resist Ink	2.01	27%	25%	100.00%	50458	2000	1.01
Aqua Spec Fluorescent Ink	2.01	45%	35%	100.00%	50458	2000	5.07
Aqua Gloss Black	2.13	53%	51%	100.00%	50458	2000	0.72
Laser Lock	5.67	57%	56%	100.00%	50458	2000	0.79
Flexo WB-CF	1.82	51%	50%	100.00%	50458	2000	0.39

Total VOC = 1 (Water Brite System floodcoat) + 3 (Water Brite System @ 10%) + Solvents = 9.64

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

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

Press I.D.	MAXIMUM LINE SPEED FEET/MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000 MMin^2/YEAR
PB1	500	12	18	60	8760	1000000 56765

INK VOCS Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.1	59%	49%	100.00%	56765	2000	5.96
Water Brite System	2.1	49%	35%	100.00%	56765	2000	8.34
Water Gloss Ink	2.15	63%	58%	100.00%	56765	2000	2.84
Water Heat Resistant	2.19	57%	55%	100.00%	56765	2000	0.91
Water Litho System	2.18	59%	49%	100.00%	56765	2000	5.94
Aqua Spec Label Inks	2.01	26%	25%	100.00%	56765	2000	0.57
Aqua Spec Metallic Inks	2.24	21%	20%	100.00%	56765	2000	0.64
Aqua Spec Heat Resist Ink	2.01	27%	25%	100.00%	56765	2000	1.14
Aqua Spec Fluorescent Ink	2.01	45%	35%	100.00%	56765	2000	5.70
Aqua Gloss Black	2.13	53%	51%	100.00%	56765	2000	0.81
Laser Lock	5.67	57%	56%	100.00%	56765	2000	0.89
Flexo WB-CF	1.82	51%	50%	100.00%	56765	2000	0.44

Total VOC = 1 (Water Brite System floodcoat) + 1 (Water Brite System @ 10%) + Solvents = 9.18

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

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

Press I.D.	MAXIMUM LINE SPEED FEET/MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000 MMin^2/YEAR
PS1	500	12	16	60	8760	1000000 50458

INK VOCS Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.1	59%	49%	100.00%	50458	2000	5.30
Water Brite System	2.1	49%	35%	100.00%	50458	2000	7.42
Water Gloss Ink	2.15	63%	58%	100.00%	50458	2000	2.53
Water Heat Resistant	2.19	57%	55%	100.00%	50458	2000	0.81
Water Litho System	2.18	59%	49%	100.00%	50458	2000	5.28
Aqua Spec Label Inks	2.01	26%	25%	100.00%	50458	2000	0.51
Aqua Spec Metallic Inks	2.24	21%	20%	100.00%	50458	2000	0.57
Aqua Spec Heat Resist Ink	2.01	27%	25%	100.00%	50458	2000	1.01
Aqua Spec Fluorescent Ink	2.01	45%	35%	100.00%	50458	2000	5.07
Aqua Gloss Black	2.13	53%	51%	100.00%	50458	2000	0.72
Laser Lock	5.67	57%	56%	100.00%	50458	2000	0.79
Flexo WB-CF	1.82	51%	50%	100.00%	50458	2000	0.39

Total VOC = 1 (Water Brite System floodcoat) = 7.42

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

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

THROUGHPUT
Press I.D.

MAXIMUM LINE SPEED MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin^2/YEAR
P22	500.000	12.000	17.000	60.000	8760.000	1000000 53611

INK VOCS
Ink Name
Press Id

Maxium Coverage lbs/ MMin^2	Weight % Volatiles	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.100	59%	49%	100.00%	53611	2000.000 5.40
Water Brite System	2.100	49%	35%	100.00%	53611	2000.000 7.88
Water Gloss Ink	2.150	63%	59%	100.00%	53611	2000.000 2.31
Water Heat Resistant	2.190	57%	55%	100.00%	53611	2000.000 1.17
Water Litho System	2.180	64%	61%	100.00%	53611	2000.000 1.75
Aqua Spec Label Inks	2.010	26%	25%	100.00%	53611	2000.000 0.54
Aqua Spec Metallic Inks	2.240	21%	20%	100.00%	53611	2000.000 0.60
Aqua Spec Heat Resist Ink	2.010	27%	25%	100.00%	53611	2000.000 1.08
Aqua Spec Fluorescent Inks	2.010	45%	35%	100.00%	53611	2000.000 5.39
Aqua Gloss Black	2.130	53%	51%	100.00%	53611	2000.000 1.14
Laser Lock	5.670	57%	56%	100.00%	53611	2000.000 1.52
Flexo WB-CF	6.790	51%	50%	100.00%	53611	2000.000 1.82
Hot Melt Adhesive	85.560	0.002%	0%	100.00%	53611	2000.000 0.0459
Press Wash	0.048	100%	0%	100.00%	53611	2000.000 1.29
Ammonia	0.205	96%	96%	100.00%	53611	2000.000 0.00

Total VOC = 1 (Water Brite System floodcoat) + 6 (Water Brite System @ 10 %) + Solvents
13.9
76
3.2
Ton/yr
lbs./day
lbs./hr

NOTE: It would be unrealistic to have every ink/coating to be considered a floodcoat, therefore, it was determined using the worst case, that one (1) floodcoat plus 10% of ink/coating on the six (6) other towers, plus the solvents would be a realistic number.

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

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

THROUGHPUT Press I.D.	MAXIMUM LINE SPEED MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000 MMin^2/YEAR	
P23	500.000	12.000	17.000	60.000	8760.000	1000000	53611
INK VOCS Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Water Gloss Varnish	2.100	59%	49%	100%	53611	2000	5.40
Water Brite System	2.100	49%	35%	100%	53611	2000	7.88
Water Gloss Ink	2.150	63%	59%	100%	53611	2000	2.31
Water Heat Resistant	2.190	57%	55%	100%	53611	2000	1.17
Water Litho System	2.180	64%	61%	100%	53611	2000	1.75
Aqua Spec Label Inks	2.010	26%	25%	100%	53611	2000	0.54
Aqua Spec Metallic Inks	2.240	21%	20%	100%	53611	2000	0.60
Aqua Spec Heat Resist Ink	2.010	27%	25%	100%	53611	2000	1.08
Aqua Spec Fluorescent Inks	2.010	45%	35%	100%	53611	2000	5.39
Aqua Gloss Black	2.130	53%	51%	100%	53611	2000	1.14
Laser Lock	5.670	57%	56%	100%	53611	2000	1.52
Flexo WB-CF	6.790	51%	50%	100%	53611	2000	1.82
Press Wash	0.056	100%	0%	100%	53611	2000	1.50
Ammonia	0.237	96%	96%	100%	53611	2000	0.00
STC DVE Dispersion	2.300	46%	46%	100%	53611	2000	0.04
STC Black & Color Base	2.110	57%	57%	100%	53611	2000	0.01
Thermacolor Barrier	5.500	61%	61%	100%	53611	2000	0.24
Spot Direct Thermal Top	5.720	68%	67%	100%	53611	2000	0.75

Total VOC = 1 (Water Brite System floodcoat) + 7 (Water Brite System @ 10 %) + Solvents

	14.9	Ton/yr
	82	lbs./day
	3.4	lbs./hr

NOTE: It would be unrealistic to have every ink/coating to be considered a floodcoat, therefore, it was determined using the worst case, that one (1) floodcoat plus 10% of ink/coating on the seven (7) other towers, plus the solvents would be a realistic number.

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN A5 FLASH OFF OF 80%. OTHER TYPE OF PRINTERS HAVE A FLASH OFF OF 100%

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin^2/YEAR
#2	500.000	12.000	9.000	60.000	8760.000	1000000	28382

INK VOCS

Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles	Weight % Water	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
MCD Black	3.594	61%	1%	100%	28382	2000	30.65
MCD Black	3.594	61%	1%	100%	28382	2000	30.65
1007 Black Ink	2.150	94%	94%	100%	28382	2000	0.03
Total VOC = 1 (Water Brite System floodcoat) + Solvents							
						30.7	Ton/yr
						168	lbs./day
						7.00	lbs./hr

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

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

Indiana Department of Environmental Management
Office of Air Management
and
Vigo County Air Pollution Control

Addendum to the
Technical Support Document for a Federally Enforceable State Operating Permit
(FESOP)

Source Name:	Standard Register Company
Source Location:	1251 North Fruitridge Avenue
County:	Vigo
FESOP Permit No.:	F167-7790-00060
SIC Code:	2761
Permit Reviewer:	Darren Woodward

On December 24, 1997, Vigo County Air Pollution Control (VCAPC) had a notice published in the tribune Star, Terre Haute, Indiana, stating that Standard Register Company had applied for a FESOP Permit to operate a stationary flexographic printing operation. The notice also stated that VCAPC proposed to issue a FESOP Permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP Permit should be issued as proposed.

On December 31, 1997, Standard Register Company submitted the following comment on the proposed permit:

1. Comment

Concerning D.1.7, item (a) indicates that "daily" records of VOC usage must be kept. Item (1) of this same section indicates that these records can be obtained from Purchase Orders or Invoices. Item (2) requires a log of the dates of use. Items (3), (4), and (5) each require daily records.

I am currently compiling a list of the VOC/HAP items received at this plant. I am calculating the emission for the total of each received item and recording the total emission amounts for that item. Even if only a portion of the product is used and a significant amount is disposed of without the item emitting all of it's VOC's, **ALL** potential emissions are accounted for using this system.

Under the current reporting system, all items received during a month are listed. This should comply with the log requirement in (2). The total amount of each item received is calculated if multiple shipments of the same item are received. The VOC percentage for that item is calculated with the total pounds received to determine the total emissions of that item. The sum of emissions for each item is reported and totaled to calculate the maximum emissions from all items received for that month.

Solvent usage has no bearing since the solvent is used to clean the presses. The ink is water-based making the use of solvents limited to cleanup. Any water-based additives that contain VOC/HAP components are listed on the monthly report also. All drummed items including the "Cyrel" solvents will be listed at the time of receiving for emission recording also.

My question is this: Can the language be changed to “monthly” rather than “daily”, and if so, is the information that I have mentioned above and previously reported sufficient?

Response

The language shall be changed to state monthly record keeping instead of daily record keeping. The information is sufficient for this reporting requirement.

Upon further review, OAM and VCAPC made the following changes:

1. B.1 (Permit No Defense) rule cite changed from [IC 13-15][IC 13-17] to [326 IAC 2-1-10][IC 13].
2. B.12 (Annual Compliance Certification) has been modified as follows:
B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
The Permittee shall annually *submit a compliance certification report which addresses the status of the source's compliance* with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than July 1 of each year to:
3. C.3 (Open Burning) has been modified as follows:
C.3 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. *326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.*
4. C.5 (Fugitive Dust Emissions) has been modified as follows:
C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). *326 IAC 6-4-2 (4) is not federally enforceable.*
5. C.18 (General Reporting Requirements) part (a) and (b) has been revised and the rest of the condition has been re-lettered as follows:
C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

(a) *To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.*

(b) *The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:*

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47808

(c) 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, OAM, and VCAPC on or before the date it is due.

(d) Unless otherwise specified in this permit any quarterly report shall be submitted within

thirty (30) days of the end of the reporting period.

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule of limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

6. (Testing Requirements) remove 326 IAC 2-1-4(f) rule cite.

D.1.5 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.