

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR MANAGEMENT

ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION

**Print Communications
2457 East Washington Street
Indianapolis, Indiana 46201**

(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.: F097-7708-00298	
Issued by: Dr. Robert Holm, Administrator	Issuance Date: July 21, 1997
First Significant Permit Modification SMF 097-9276	Affected Pages: 4, 24, 25, 27 Pages 23a and 23b supercede Page 23 Pages 26a through 26d supercede Page 26 Pages 28a and 28b supercede Page 28 Pages 29a through 29c supercede Page 29
Issued by: Dr. Robert Holm, Administrator	Issuance Date: March 16, 1998

SECTION A SOURCE SUMMARY

This permit is based on information presented in the permit application and any information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and ERMD and submitted to IDEM, OAM and ERMD.

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

The Permittee owns and operates a Stationary Commercial Printing Source.

Responsible Official: Randy Steenbergen
Source Address: 2457 East Washington Street
Mailing Address: Indianapolis, Indiana, 46201
SIC Code: 2759
County Location: Marion
County Status: Attainment for all pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD or 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:

- a) Emission unit 1 is a Heidelberg MO nonheatset lithographic sheet fed press with a maximum process capacity 5.82 million square inches per hour. Emissions from this emission unit are exhausted in to the building.
- b) Emissions unit 2 is a Harris M110 heatset lithographic web press with a maximum process capacity 18.72 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-1.
- c) Emissions unit 4 is a Harris M200 heatset lithographic web press with a maximum process capacity 25.92 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-3
- d) Emissions unit 5 is Goss B nonheatset lithographic web press with a maximum process capacity 22.58 million square inches per hour. Emissions from this emission unit are exhausted in to the building.
- e) Emissions unit 6 is a Goss A heatset lithographic web press with a maximum process capacity 24.09 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-4
- f) Emissions unit 7 is a Diddie Glaser nonheatset lithographic web press with a maximum process capacity 7.56 million square inches per hour. Emissions form this emission unit are exhausted in to the building.
- g) Emission Unit #9 is a Heidelberg heatset lithographic web press with a maximum process capacity of 22.58 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-2.
- h) Emission Unit #10 is a Goss C nonheatset lithographic web press with a maximum operating capacity of 27.09 million square inches per hour. VOC emissions from this emission unit are exhausted to the building.

C.17 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

Environmental Resources Management Division
Air Quality Management Section, Compliance Data Section
2700 South Belmont Ave.
Indianapolis Indiana 46221

- (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 ERMD 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 or 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.25 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

The following six (6) Lithographic Printing Presses:

- a) Emission unit 1 is a Heidelberg MO nonheatset lithographic sheet fed press with a maximum process capacity 5.82 million square inches per hour. Emissions from this emission unit are exhausted in to the building.
- b) Emissions unit 2 is a Harris M110 heatset lithographic web press with a maximum process capacity 18.72 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-1.
- c) Emissions unit 4 is a Harris M200 heatset lithographic web press with a maximum process capacity 25.92 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-3
- d) Emissions unit 5 is Goss B nonheatset lithographic web press with a maximum process capacity 22.58 million square inches per hour. Emissions from this emission unit are exhausted in to the building.
- e) Emissions unit 6 is a Goss A heatset lithographic web press with a maximum process capacity 24.09 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-4
- f) Emissions unit 7 is a Diddie Glaser nonheatset lithographic web press with a maximum process capacity 7.56 million square inches per hour. Emissions from this emission unit are exhausted in to the building.

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

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 the total VOC emissions for emissions units numbers 1, 2, 4, 5, 6, and 7 and emission units 9 and 10 identified in section D.2 shall not exceed 7.90 tons per month such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The following emissions limitations shall not be construed to mean that the total VOC emissions can exceed the emission limitations stated in condition D.1.1.

- (a) The VOC emissions from emission unit 2, including cleanup solvents, shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
- (b) The VOC emissions from emission unit 4, including cleanup solvents, shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
- (c) The VOC emissions from emission unit 5, including cleanup solvents, shall not equal or

exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.

- (d) The VOC emissions from emission unit 6, including cleanup solvents, shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.

Compliance Determination Requirements

D.1.3 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 2-1-4(f) and 326 IAC 2-8-4.

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC emission limitations contained in Conditions D.1.1 and D.1.2 shall be determined based emission calculations using the weight percent of VOC per coating established using methods specified in 326 IAC 8-1-4(a)(3)(A) as supplied by the coating manufacturer, weight of VOC containing materials used during the respective compliance periods, a VOC retention factor of 95% for nonheatset inks and a VOC retention factor of 15% for heatset inks. IDEM, OAM and ERMD reserves the authority to determine compliance using emissions calculations in conjunctions with Method 24 and 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.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1 and D.1.2.
- (1) The daily weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used,
 - (2) The VOC content (weight percent) of each material used, and
 - (3) The monthly weight of VOCs emitted.
- b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 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.

SECTION D.2 FACILITY CONDITIONS

- g) Emission Unit 9 is a Heidelberg heatset lithographic web press with a maximum process capacity of 22.58 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-2.
- h) Emission Unit 10 is a Goss C nonheatset lithographic web press with a maximum operating capacity of 27.09 million square inches per hour. VOC emissions from this process are exhausted to the building.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM and ERMD may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

D.2.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

D.2.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Indianapolis Environmental Resources Management Division
Air Quality Management Section
2700 S. Belmont Street
Indianapolis, Indiana 46221

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM and ERMD.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

Operation Conditions

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

D.2.6 Volatile Organic Compounds (VOCs) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 the total VOC emissions for emissions units numbers 9 and 10 and emission units 1, 2, 4, 5, 6, and 7 identified in section D.1 shall not exceed 7.90 tons per month such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.

D.2.7 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The following emissions limitations shall not be construed to mean that the total VOC emissions can exceed the emission limitations stated in condition D.2.6.

- (a) The VOC emissions from emission unit 9, including cleanup solvents, shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.
- (b) The VOC emissions from emission unit 10, including cleanup solvents, shall not equal or exceed 2 tons per month such that the General VOC Emissions Reduction Regulation 326 IAC 8-1-6 shall not apply.

Compliance Determination Requirements

D.2.8 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 2-1-4(f) and 326 IAC 2-8-4.

D.2.9 Volatile Organic Compounds (VOC)

Compliance with the VOC emission limitations contained in Conditions D.2.6 and D.2.7 shall be determined based emission calculations using the weight percent of VOC per coating established using methods specified in 326 IAC 8-1-4(a)(3)(A) as supplied by the coating manufacturer, weight of VOC containing materials used during the respective compliance periods, a VOC retention factor of 95% for nonheatset inks and a VOC retention factor of 15% for heatset inks. IDEM, OAM and ERMD reserves the authority to determine compliance using emissions calculations in conjunctions with Method 24 and 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.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6 and D.2.7, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.6 and D.2.7.
- (1) The daily weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used,
 - (2) The VOC content (weight percent) of each material used, and
 - (3) The monthly weight of VOCs emitted.
- b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.6 and D.2.7 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.

SECTION D.3

FACILITY OPERATION CONDITIONS

Insignificant Emitting Activity;

i) Trimmer equipped with a dust collector to control particulate matter emissions

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the trimming operation shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirement

D.3.2 Control Requirement

The Permittee shall operate a dust collector to control particulate matter emissions from the trimmer.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Print Communications
Source Address: 2457 East Washington Street, Indianapolis, Indiana
Mailing Address: 2457 East Washington Street, Indianapolis, Indiana
FESOP No.: F097-7708-00298:

**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:

- Annual Compliance Certification Letter
- Emergency/Deviation Occurrence Reporting Form
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

2700 S. Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

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

Source Name: Print Communications
Source Address: 2457 East Washington Street, Indianapolis, Indiana
Mailing Address: 2457 East Washington Street, Indianapolis, Indiana
FESOP No.: F097-7708-00298

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
<input checked="" type="radio"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the ERMD and OAM, within four (4) business hours; and CThe Permittee must submit notice in writing or by facsimile to ERMD and OAM within two (2) days, and follow the other requirements of 326 IAC 2-8-12
<input type="radio"/> 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) CThe Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:

Date/Time Emergency/Deviation was corrected:

Was the facility being properly operated at the time of the emergency/deviation? Y N
Describe:

Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NO_x, CO, Pb, other:

Estimated amount of pollutant(s) emitted during emergency/deviation:

Describe the steps taken to mitigate the problem:

Describe the corrective actions/response steps taken:

Describe the measures taken to minimize emissions:

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____

Date:

Phone:

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

FESOP Quarterly Report

Source Name: Print Communications
 Source Address: 2457 East Washington Street, Indianapolis, Indiana
 Mailing Address: 2457 East Washington Street, Indianapolis, Indiana
 FESOP No.: F097-7708-00298
 Facility: Emitting units 1, 2, 4, 5, 6, 7, 9, and 10
 Parameter: Volatile Organic Compound Emissions
 Limit: 2 tons of VOC per month for emitting units 2, 4, 5, 6, 9 and 10 individually; 7.90 ton per month for all emitting units combined.

Emitting Unit	VOC Emissions (tons/month)		
	Month	Month	Month
1			
2			
4			
5			
6			
7			
9			
10			
Total			

No deviation occurred in this month.

Deviation/s occurred in this month.
 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
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE REPORT**

Source Name: Print Communications
Source Address: 2457 East Washington Street, Indianapolis, Indiana
Mailing Address: 2457 East Washington Street, Indianapolis, Indiana
FESOP No.: F097-7708-00298

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that, Print Communications has constructed the following: One Heidelberg Heatset Web Lithographic Press and One Goss C Web Nonheat Lithographic Set Press in conformity with the requirements and intent of the construction permit application received by the Environmental Resources Management Division on December 12, 1997 and as permitted pursuant to **Significant FESOP Modification SMF 097-7703-00298** issued on _____.

5. Additional (?operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit. (Delete this statement if it does not apply.)

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 19 _____.

My Commission expires: _____

Signature

Name (typed or printed)

Indianapolis Environmental Resources Management Division(ERMD) Air Quality Management Section

Technical Support Document for Significant Modification to the Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review

Source Background And Description

Source Name: Print Communications
Source Location: 2457 East Washington Street, Indianapolis, Indiana
Source Address: 2457 East Washington Street, Indianapolis Indiana
County: Marion
SIC Code: 2759
Operation Permit No.: F097-7703-00298
Permit Modification No.: SMF-097-9276-00298
Permit Reviewer: Mr. Patrick Coughlin

The Environmental Resources Management Division (ERMD) has reviewed an application from Print Communications relating to the construction and operation of two lithographic presses:

- a) Emission Unit 9 is a Heidelberg heatset lithographic web press with a maximum process capacity of 22.58 million square inches per hour. The emissions from this emission unit are exhausted out one stack identified as SV-2.
- b) Emission Unit 10 is a Goss C nonheatset lithographic web press with a maximum operating capacity of 27.09 million square inches per hour. VOC emissions from this process are exhausted to the building.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S2	Emission unit 9	23	16" x 16"	6600	250
Exhausts into building	Emissions unit 10	NA	NA	NA	NA

Recommendation

The staff recommends to the Administrator that the construction and operation 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 application for the purposes of this review was received on December 12, 1997.

Emissions Calculations

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations page 1 of 1.

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity) for the two lithographic presses identified as emission units 9 and 10 only:

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	0	0
Particulate Matter (PM10)	0	0
Sulfur Dioxide (SO ₂)	0	0
Volatile Organic Compounds (VOC)	Same as Potential	196
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO _x)	0	0
Single Hazardous Air Pollutant (HAP)	<1	<1
Combination of HAPs	<1	<1

- (a) The potential emissions are the same as the allowable emissions since there is no emissions control equipment utilized.
- (b) Allowable emissions (as defined in the Indiana Rule) of VOC are greater than 25 tons per year. Therefore, pursuant to IAPCB Reg. IX-1 and 326 IAC 2-1-3, a construction permit is required. This approval satisfies the requirements of IAPCB Reg. IX-1 and 326 IAC 2-1-3.

County Attainment Status

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for SO₂, CO, PM-10, Pb and NO₂. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0
PM10	0
SO ₂	0
VOC	99
CO	0
NO _x	0

- (a) This existing source is not a major source because the source has been issued a FESOP on July 21, 1997 with a limit of 99 tons per year of VOCs.
- (b) These emissions were based on the FESOP issued to the source on July 21, 1997.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)	Single HAP (ton/yr)	Combo HAPs (ton/yr)
Proposed Modification	0	0	0	(1)	0	0	<1	<1
Existing FESOP Limits F-000-0000, issued on 12/11/96	99	99	99	99	99	99	9	24
Revised FESOP Limits including the emissions from the two new presses)				(1)				
Title V Significant Levels	99	99	99	99	99	99	9	24
Note: This source will be able to keep its FESOP status.								

(1) The source has requested that the two new lithographic presses comply with the existing FESOP limits of 7.9 tons of VOC per month for all significant emitting units combined. This source does not have the potential to emit HAPs greater than the major source thresholds.

This modification to this FESOP stationary source will **not** change the status of the stationary source because the emissions increase is still less than the FESOP significant levels. Therefore, the following requirements will not apply:

- (a) PSD, 326 IAC 2-2, and 40 CFR 52.21,
- (b) Emission Offset, 326 IAC 2-3, and
- (c) Part 70 Permit Program, 326 IAC 2-7.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12) and National Emission Standards for Hazardous Air Pollutants for Source Categories (40 CFR Part 63) applicable to this facility.

New Source Performance Standard Subpart QQ does not apply to these presses since emission units 9 and 10 are lithographic presses and not rotogravure presses.

National Emission Standard for Hazardous Air Pollutants (NESHAP) Subpart KK applies to new and existing **major sources** of HAP emissions at which publication rotogravure, product and packaging rotogravure, or wide web flexographic printing presses are operated. The NESHAP 40 CFR Part 63 Subpart KK is not applicable to these emissions units since they are not publication rotogravure, product and packaging rotogravure, or wide web flexographic printing presses. In addition to this this source does not have the potential to emit HAP greater than the major source thresholds.

State Rule Applicability

Flexographic Printing 326 IAC 8-5-5

This regulation does not apply since these presses are lithographic presses.

New Facilities; General Reduction Requirements Regulation 326 IAC 8-1-6

Emission units 9 and 10 are subject to the New Facilities; General Reduction Requirements Regulation 326 IAC 8-1-6 since these presses each have potential emissions greater than 25 tons of VOC per year, are not regulated under any other provisions under article 8 and are being installed after January 1, 1980. However Print Communications has opted to limit the VOC emissions from each of the two presses to less than 2 tons per month such that the requirements of 326 IAC 8-1-6 shall not apply. Potential emissions calculations are included in appendix A.

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 Environmental Resources Management Division (ERMD) Construction Permit Application Form Y.

- a) The allowable emissions of HAPs from the two new presses identified as emissions unit 9 and 10 are less than 1 ton per year, consequently this modification is not major for HAPs and 326 IAC 2-1-3.3 does not apply.
- b) The potential HAP emissions from this source are less than the major source thresholds.

Additional FESOP Changes Requested

On December 12, 1997 Print Communications stated that emission unit 3 was taken out of service and should be removed from the permit.

FESOP Permit Changes

The following changes were made as the first Significant Modification for this source:

- a) Condition A.2. on page 4 was modified to include the two new presses emissions units 9 and 10 and the removal of the emission unit 3.
- b) Condition C.17 General Reporting Requirements (page 23a and 32b) was revised to reflect updated permit language adopted by IDEM and ERMD.
- c) Section D.1 on page 24 was revised to reflect the removal of emission unit 3. In addition to this the description for the new emitting units 9 and 10 were moved to a newly created D.2 section for the new construction.

- d) Condition D.1.1 modified as follows:
 - 1. Condition D.1.1 (b) was deleted since 326 IAC 8-1-6 does not apply to modifications.
 - 2. Condition D.1.1 was broken up into two separate conditions D.1.1 and D.1.2. Condition D.1.1 limits the total VOC emissions such that the Part 70 program shall not apply. Condition D.1.2 limits the VOC emissions from the individual emitting units such that the General VOC Emissions Reduction requirements do not apply.
 - 3. All Reference to emissions unit 3, 8, 9 and 10 were removed.
- e) Condition D.1.2 D.1.3 and D.1.4 were renumbered D.1.3 D.1.4 and D.1.5 respectively (page 25).
- f) New Section D.2 was added to the permit for the new presses identified as emissions units 9 and 10 (pages 26a through 26c).
- g) Existing Section D.2 was renumbered D.3 (page 26d).
- h) The Certification form was revised (page 27).
- i) The Deviation form was replaced with a new two page form (pages 28a and 28b)
- j) Quarterly FESOP Compliance Reporting Form was revised to reflect the removal of emission unit 3 and the addition of emission units 9 and 10 (page 29a).
- k) A new quarterly summary report of deviations was added as a standard requirement adopted by IDEM and ERMD (page 29b).
- l) An affidavit of construction form was added as a standard requirement for new construction (page 29c).

Limited Potential to Emit

The table of limited potential to emit has been revised as follows.

Process/ facility	Limited PTE (tons/year)						
	PM	PM-10	SO2	VOC	CO	NOx	HAPs
Lithographic Presses 1, 2, 4, 5, 6, 7, 9 and 10	1.8	1.8	0.00	94.8 tons/yr or 7.90 tons/month	0.00	0.00	2.49 tons for an individual HAP 7.61 tons for a combination of HAPs
Insignificant a) Pre Press Area b) Ryobi Press, identified as emissions unit 8	NA	NA	NA	a) Default value of 2.74 tons/yr b) 1.48 tons/yr	NA	NA	Default value of 2 tons of a combination of HAPs and 1 ton for any individual HAP

	Limited PTE (tons/year)						
Total Emissions	NA	NA	NA	99 tons/yr	NA	NA	3.49 tons for a individual HAP 9.61 tons for any combination of HAPs

Appendix A Emissions Calculations

Source Name: Print Communications
 Permit No. F097-7708-00298
 Modification No. SMF 097-9276

On December 6, 1997 ERMD received a application for a significant modification involving the installation of 2 new presses and the elimination of emission unit 3 (AFT Press)
 The Potential Emissions are calculated below:

#9, Heidelberg Web Heatset

PTE for VOCs

Compound Name (Compound with highest VOC content)	Maxium Coverage lbs MMin ²	Weight % Volatiles*	Flash Off %	Through Put MMin ² Year	Tons 2000 lbs	Tons Year (2)
Flint Web Inks (112)	3.35	40.50%	85.00%	237276.86	2000	136.82
Varn Lithoetch 142 W	0.15	0.14%	100.00%	237276.86	2000	0.02
Blanket Wash (230)	0.26	100.00%	100.00%	237276.86	2000	30.85

Note: This press uses Braden Ink or Flint Inks

PTE for HAPs

Compound Name	HAPS	Cass #	Maxium Coverz MMin ²	% HAP	Flash Off %	Through Put MMin ² Hour	Tons Year
Varn Lithoetch 142 W	Glycol Ether	Varies	0.15	0.00003	100.00%	197793.79	0.00041537

#10, Goss C Non Heatset

PTE for VOCs

Compound Name (Compound with highest VOC content)	Maxium Coverage lbs MMin ²	Weight % Volatiles*	Flash Off %	Through Put MMin ² Year	Tons 2000 lbs	Tons Year (2)
Flint Soya Based Inks (112)	3.35	19.00%	5.00%	197793.79	2000	3.15
Rycoline Seven 424S (196)	0.15	0.00%	100.00%	197793.79	2000	0.00
Blanket Wash (230)	0.26	100.00%	100.00%	197793.79	2000	25.71

**Indianapolis Environmental Resources Management Division(ERMD)
Air Quality Management Section**

**Addendum to the Technical Support Document for Significant Modification
to the Federally Enforceable State Operating Permit (FESOP) and Enhanced
New Source Review**

Source Background And Description

Source Name:	Print Communications
Source Location:	2457 East Washington Street, Indianapolis, Indiana
Source Address:	2457 East Washington Street, Indianapolis Indiana
County:	Marion
SIC Code:	2759
Operation Permit No.:	F097-7703-00298
Permit Modification No.:	SMF-097-9276-00298
Permit Reviewer:	Mr. Patrick Coughlin

On January 24, 1998, the Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Print Communications had applied for a Significant Modification to their Federally Enforceable State Operating Permit (FESOP). This modification was limited to the installation of two new presses identified as emission units 9 and 10 and the removal of one presses identified as emissions unit 3. The notice also stated that ERMD proposed to issue a Significant Modification to the FESOP and provided information on how the public could review the proposed Significant FESOP Modification 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 should be issued as proposed.

Upon further review ERMD made the following additional changes:

1. ERMD has added a new condition D.1.4 for VOC compliance (page 25 of 29). This condition is necessary in order to establish how compliance with conditions D.1.1 and D.1.2 is to be determined.
2. ERMD has added a new condition D.2.9 (page 26b of 29). This condition is necessary in order to establish how compliance with conditions D.2.6 and D.2.7 is to be determined.

During the 30 public notice period ERMD received comments from IDEM. ERMD response to these comments are stated below:

1. Mr. Richard Sekula commented that section D.1 states "the following (7) ... presses" then lists 8 units. Section D.1.1 also contains a reference to emission unit 8 with no reference to such unit in section D.1.

Response: This was a typographic error. D.1 has been changed to read "The following six (6) Lithographic Printing Presses:". The references to emissions unit 8 in section D.1.1 and the Quarterly FESOP Report has been deleted. Emissions unit 8 is an insignificant emitting activity, the emissions from which have been accounted for in establishing the FESOP limit of 7.9 tons of VOC per month.

2. Ms. Ann Mclver commented that the permit should be restructured such that each press should

have its own unique D condition and the presses which are new construction should be clearly identified in section D.

Response : ERMD understands that this comment is has been requested for the purpose of making the applicable requirements easier to discern. ERMD has broken up the applicable requirements specified in D.1.1 into two separate conditions D.1.1 and D.1.2. Condition D.1.1 limits the total VOC emissions such that the Part 70 program shall not apply. Condition D.1.2 limits the VOC emissions from the individual emitting units such that the General VOC Emissions Reduction requirements do not apply.

In addition to this ERMD has revised the permit to include a separate D section for the new presses. This revision was necessary to include the standard construction permit conditions.