

# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

## OFFICE OF AIR MANAGEMENT and INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION

**Queens Group, Inc.  
620 South Belmont Avenue  
Indianapolis, Indiana 46268**

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

This permit is issued 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.: F097-5450-00107	
Issued by: Dr. Robert Holm Administrator, ERMD	Issuance Date: December 11, 1996
First Significant Permit Modification: SMF097-9370	Pages Affected: 1 thru 35
Issued by: Dr. Robert Holm, Administrator ERMD	Issuance Date:

Queens Group, Inc.  
Indianapolis, Indiana

First Significant Permit Modification SMF097-9370  
Permit Reviewer: Patrick Coughlin

Page 2 of 35  
FESOP No. F097-5450-00107

<b>SECTION A</b>	<b>SOURCE SUMMARY</b>	4
A.1	General Information [326 IAC 2-8-3(b)]	4
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	4
A.3	Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]	4
A.4	FESOP Permit Applicability [326 IAC 2-8-2]	5
A.5	Prior Permit Conditions Superseded [326 IAC 2]	6
<b>SECTION B</b>	<b>GENERAL CONDITIONS</b>	7
B.1	Permit No Defense [326 IAC 2-1-10][IC 13]	7
B.2	Definitions [326 IAC 2-8-1]	7
B.3	Permit Term [326 IAC 2-8-4(2)]	7
B.4	Enforceability [326 IAC 2-8-6]	7
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]	7
B.6	Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]	7
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	7
B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]	7
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	8
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	8
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]	8
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	9
B.13	Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)] [326 IAC 1-6-3]	9
B.14	Emergency Provisions [326 IAC 2-8-12]	10
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	12
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination	12
B.17	Permit Renewal [326 IAC 2-8-3(h)]	13
B.18	Administrative Permit Amendment [326 IAC 2-8-10]	14
B.19	Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]	14
B.20	Significant Permit Modification [326 IAC 2-8-11(d)]	15
B.21	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)]	15
B.22	Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]	15
B.23	Operational Flexibility [326 IAC 2-8-15]	15
B.24	Construction Permit Requirement [326 IAC 2]	17
B.25	Inspection and Entry [326 IAC 2-8-5(a)(2)]	17
B.26	Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]	17
B.27	Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	18
B.28	Enhanced New Source Review [326 IAC 2]	18
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS</b>	19
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1	Overall Source Limit [326 IAC 2-8]	19
C.2	Opacity [326 IAC 5-1]	19
C.3	Open Burning [326 IAC 4-1][IC 13-17-9]	19
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	19
C.5	Fugitive Dust Emissions [326 IAC 6-4]	20
C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]	20
C.7	Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]	20
	<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.8	Performance Testing [326 IAC 3-2.1]	20

<b>Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]</b>	
C.9	Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)] . . . . . 20
C.10	Monitoring Methods [326 IAC 3] . . . . . 21
C.11	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140] . . . . 21
<b>Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]</b>	
C.12	Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215] . . . . . 22
C.13	Actions Related to Noncompliance Demonstrated by a Stack Test . . . . . 23
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b>	
C.14	Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)] . . . . . 23
C.15	Monitoring Data Availability . . . . . 24
C.16	General Record Keeping Requirements [326 IAC 2-8-4(3)(B)] . . . . . 24
C.17	General Reporting Requirements [326 IAC 2-8-4(3)(C)] . . . . . 25
<b>Stratospheric Ozone Protection</b>	
C.18	Compliance with 40 CFR 82 and 326 IAC 22-1 . . . . . 26
<b>SECTION D.1 FACILITY OPERATION CONDITIONS</b>	
<b>Six (5) Sheet Fed Lithographic Non-heatset Presses and Prepress Area . . . . . 27</b>	
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
D.1.1	Volatile Organic Compounds (VOC) [326 IAC 2-8-4(1)] . . . . . 27
D.1.2	Volatile Organic Compounds (VOC) [326 IAC 8-1-6] . . . . . 27
D.1.3	Hazardous Air Pollutants (HAPs) [326 IAC 8-4-1(1)] . . . . . 28
<b>Compliance Determination Requirements</b>	
D.1.4	Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) . . . . . 28
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]</b>	
D.1.5	Record Keeping Requirements . . . . . 28
D.1.6	Reporting Requirements . . . . . 29
<b>Certification Form . . . . . 30</b>	
<b>Emergency/Deviation Form . . . . . 31</b>	
<b>Quarterly Report Form (Volatile Organic Compounds) . . . . . 33</b>	
<b>Quarterly Report Form (Hazardous Air Pollutants) . . . . . 34</b>	
<b>Quarterly Report Form . . . . . 35</b>	

## 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 the Indianapolis Environmental Resources Management Division (ERMD), and presented in the permit application.

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

---

The Permittee owns and operates a Lithographic Printing Operation.

Responsible Official: Mr. Richard Popp  
Source Address: 620 S. Belmont Avenue, Indianapolis, Indiana 46268  
Mailing Address: 620 S. Belmont Avenue, Indianapolis, Indiana 46268  
SIC Code: 2731  
County Location: Marion  
County Status: Nonattainment for Sulfur Dioxide, and Total Suspended Particulates  
Source Status: Minor Source, FESOP Program

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

---

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

- (1) Emission unit M-1 is a Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. The press exhausted to one stack identified as S<sub>1</sub>. The maximum operating capacity of this press is 14.57 million square inches per hour.
- (2) Emission unit M-2 is a Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. The press exhausted to one stack identified as S<sub>4</sub>. The maximum operating capacity of this press is 22.74 million square inches per hour.
- (3) Emission unit P-8 is a Planeta Sheet Fed Non-heat Set Offset Lithographic Press. This press exhausted to one stack identified as S<sub>2</sub>. The maximum operating capacity of this press is 18.93 million square inches per hour.
- (4) Emission unit P-9 is a Planeta Sheet Fed Non-heat Set Offset Lithographic Press. This press exhausted to one stack identified as S<sub>3</sub>. The maximum operating capacity of this press is 16.16 million square inches per hour.
- (5) Emission unit H-3 is a Harris Sheet Fed Non-heat Set Offset Lithographic Press. This press exhausted to general building exhaust. The maximum operating capacity of this press is 20.96 million square inches per hour.
- (6) Emission unit PA-1 is the Pre-press area. This area is used for photographing, developing of film and preparation of plates for the printing operation.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [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(21):

- (1) Natural gas fired combustion source with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

- (3) Vessels storing lubricating oils, hydraulic oil, machining oils, and machining fluids.
- (4) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (5) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (6) Cleaners and solvents characterized as follows:
  - A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F)
  - B) having a vapor pressure equal to or less than .7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 oF)

The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (7) Closed loop heating and cooling systems.
- (8) Infrared curing equipment
- (9) Exposure chamber ("tower", "columns"), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge.
- (10) Any of the following structural steel and bridge fabrication activities:
  - A) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent
  - B) Using 80 tons or less of welding combustibles
- (11) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (12) Heat exchanger cleaning and repair
- (13) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (14) Paved and unpaved roads and parking lots with public access.
- (15) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.
- (16) Particulate emissions from the use of anti offset powders at the presses was classified as an insignificant emitting activity based on the following information. The Potential emissions of particulate matter from each press was based on maximum usage of anti offset powder and continuous hours of operation. The potential emissions of particulate matter for all presses combined was established at 0.6 pounds per hour and 14 pounds per day.

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 the Indianapolis Environmental Resources Management Division (ERMD) for a Federally Enforceable State Operating Permit (FESOP).

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

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

## **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 ERMD.
- (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 ERMD.

### **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)]**

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

### **B.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

Environmental Resources Management Division  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD 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 ERMD copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, and ERMD along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

IDEM, OAM and ERMD 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)] [326 IAC 2-8-5(1)]

- (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) One (1) certification shall be included, on the attached Certification Form, with each

submittal.

- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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 cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 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

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

- (b) The annual compliance certification report 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.
- (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, and ERMD may require to determine the compliance status of the source.

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(34).

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare

and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated 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) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD.

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 ERMD, 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, OAM

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

ERMD

Telephone No.: 317-327-2234

Facsimile No.: 317-327-2274

Failure to notify IDEM, OAM and ERMD, 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

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

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 ERMD, 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 ERMD, 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 response steps 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

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

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

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this

subsection.

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 ERMD 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 ERMD, 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 ERMD, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and ERMD, 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 ERMD and shall include 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(21).

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

Environmental Resources Management Division  
Air Quality Management Section, Permits  
2700 South Belmont Avenue

Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) 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) 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. [326 IAC 2-5-3]
  - (2) If IDEM, OAM and ERMD 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 and ERMD 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 ERMD, 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 ERMD, 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), except as provided by 326 IAC 2-8-11(c).
- (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 provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, and ERMD 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, review by affected states 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 (this term is defined at 326 IAC 2-7-1(36)) 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

Environmental Resources Management Division  
Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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 ERMD, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) For each such Section 502(b)(10) of the Clean Air Act 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]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved 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 ERMD, 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 ERMD, 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 by an administrative amendment pursuant to 326 IAC 2-8-10.
- (c) IDEM, OAM and ERMD 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 ERMD, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.28 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations [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(21).
- (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 thirty percent (30%) 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)]**

---

All air pollution control equipment listed in this permit shall be operated at all times that the emission unit vented to the control equipment is in operation, as described in Section D of this permit.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [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 be accredited is federally enforceable.

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

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

---

- (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in 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  
2700 South Belmont Avenue

Indianapolis, Indiana 46221

no later than thirty-five (35) days before the intended test date.

- (b) All test reports must be received by IDEM, OAM and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM and ERMD, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

### **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 as required by this permit. 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

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

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(34).

#### **C.10 Monitoring Methods [326 IAC 3]**

---

Any monitoring or testing performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as 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) The Permittee shall insure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) asbestos removal or demolition start date;
    - (B) removal or demolition contractor; or
  - (3) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos 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, Asbestos  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (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. The requirement that the inspector be accredited is federally enforceable.

**Corrective Actions and Response Steps [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, subject to 40 CFR 68, is present in more than the threshold quantity, 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 a part of the compliance certification submitted under 326 IAC 2-7-6(5), 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 ERMD 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 ERMD that the Risk Management Plan is being properly implemented.

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

---

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. 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.14 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 April 15 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

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

- (b) The annual emission statement 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.

C.15 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing 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) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, 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 ERMD 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.16 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 ERMD 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 preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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 Quality 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  
2700 South Belmont Avenue  
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.18 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) Emission unit M-1 is a Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. The press exhausted to one stack identified as S<sub>1</sub>. The maximum operating capacity of this press is 14.57 million square inches per hour.
- (2) Emission unit M-2 is a Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. The press exhausted to one stack identified as S<sub>4</sub>. The maximum operating capacity of this press is 22.74 million square inches per hour.
- (3) Emission unit P-8 is a Planeta Sheet Fed Non-heat Set Offset Lithographic Press. This press exhausted to one stack identified as S<sub>2</sub>. The maximum operating capacity of this press is 18.93 million square inches per hour.
- (4) Emission unit P-9 is a Planeta Sheet Fed Non-heat Set Offset Lithographic Press. This press exhausted to one stack identified as S<sub>3</sub>. The maximum operating capacity of this press is 16.16 million square inches per hour.
- (5) Emission unit H-3 is a Harris Sheet Fed Non-heat Set Offset Lithographic Press. This press exhausted to general building exhaust. The maximum operating capacity of this press is 20.96 million square inches per hour.
- (6) Emission unit PA-1 is the Pre-press area. This area is used for photographing, developing of film and preparation of plates for the printing operation.

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

#### D.1.1 Volatile Organic Compound [326 IAC 8-4-1(1)] [326 IAC 8-1-6]

---

Pursuant to 326 IAC 8-4-1(1) the combined VOC emissions from emission units M-1, M-2, P-8, P-9, H-3, and PA-1 are limited 8.02 tons per months 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 M-1 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 M-2 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 P-8 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 P-9 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.

- (e) The VOC emissions from emission unit H-3 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.1.3 Hazardous Air Pollutants [326 IAC 8-4-1]

- (a) Pursuant to 326 IAC 8-4-1(1) the emissions of any single Hazardous from emission units M-1, M-2, P-8, P-9, H-3, and PA-1 are limited to 0.67 tons per month such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.
- (b) Pursuant to 326 IAC 8-4-1(1) the emissions of any combination of Hazardous Air Pollutants from emission units M-1, M-2, P-8, P-9, H-3, and PA-1 are limited to 1.83 tons per month such that the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.

### **Compliance Determination Requirements**

#### D.1.4 Volatile Organic Compounds and Hazardous Air Pollutants

Compliance with the VOC and HAP emissions limitations established in conditions D.1.1, D.1.2 and D.1.3 shall be based on the monthly VOC and HAP emissions calculations. The monthly VOC emissions shall be based on the monthly usage of VOC containing materials, percent weight of VOCs in materials used and shall assume a 95% VOC retention factor for inks used on the Non-heat Set Lithographic Presses. The monthly HAP emissions shall be based on the monthly usage of HAP containing materials and percent weight of HAPs in materials.

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

#### D.1.5 Recordkeeping

- (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 taken monthly. All records shall be complete and sufficient to establish compliance the VOC emission limits in condition D.1.1 and D.1.2.
  - (1) The 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;
  - (3) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable.
- (b) To document compliance with condition D.1.3 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained shall be taken monthly. All records shall be complete and sufficient to establish compliance the HAP emission limits in condition D.1.3.
  - (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) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.6 Quarterly Reporting

---

That a quarterly summary to document compliance with operation condition number D.1.1, D.1.2 and D.1.3 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, using the enclosed forms 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  
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Queens Group, Inc.  
Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
FESOP No.: F097-5450-00107

**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 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 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: Queens Group, Inc.  
Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
FESOP No.: F097-5450-00107

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<b>9</b>	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the ERMD and OAM, within four (4) business hours; and C The 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
<b>9</b>	2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) C The 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, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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: Queens Group, Inc.  
 Source Address: 620 South Belmont Avenue Indianapolis , Indiana 46268  
 FESOP No.: F097-5450-00107  
 Facility: M-1, M-2, P-8, P-9, H-3 and PA-1  
 Parameter: VOC emissions  
 Limit: VOC emissions from emitting units M-1, M-2, P-8, P-9 and H-3 shall not exceed 2 tons of VOC per month per emitting unit. The VOC emissions for all emitting units combined shall not exceed 8.02 tons per month.

**Year:** \_\_\_\_\_

Emitting Unit	VOC Emissions (tons/month)		
	Month	Month	Month
M-1			
M-2			
P-8			
P-9			
H-3			
PA-1			
Total			

Equation: VOC emissions (tons/month) =

$$i \left[ \text{density (lbs/gal)} \times \text{wt.\% of VOC} \times \text{gal. solvents/month} \right] \% i \left[ \text{density of inks (lbs/gal)} \times \text{wt.\% VOC} \times \text{gal. of inks/month} \times (100\% \& 95\% \text{ retention factor}) \right]$$

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

**OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and  
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA  
FESOP Quarterly Report**

Source Name: Queens Group, Inc.  
 Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
 FESOP No.: F097-5450-00107  
 Facility: M-1, M-2, P-8, P-9, H-3 and PA-1  
 Parameter: HAP emissions  
 Limit: 0.67 tons of an individual HAP or less, and 1.83 tons of any combination of HAPs per months or less

**Year:** \_\_\_\_\_

Month	Highest emissions of an individual HAP (Tons/Month)	Emissions of all HAPs (Tons/Month)

Equation: HAP emissions (tons/month)

$$j \text{ [density (lbs/gal) } \times \text{ wt.\% of HAP } \times \text{ gal. solvents/month]}$$

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

**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: Queens Group, Inc.  
Source Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
Mailing Address: 2700 South Belmont Avenue, Indianapolis, Indiana 46221  
FESOP No.: F097-5450-00107

**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: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indianapolis Environmental Resources Management Division 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:** Queens Group, Inc.  
**Source Location:** 620 South Belmont Ave. Indianapolis, IN. 46268  
**Source Address:** 620 South Belmont Ave. Indianapolis, IN. 46268  
**County:** Marion  
**SIC Code:** 2752  
**Operation Permit No.:** F097-5450-00107  
**Permit Modification No.:** SMF097-9370-00107  
**Permit Reviewer:** Mr. Patrick Coughlin

The Environmental Resources Management Division (ERMD) has reviewed an application from Queens Group, Inc. relating to the construction and operation of one lithographic press:

- a) Emission unit M-2 is a Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press. The press exhausted to one stack identified as S<sub>4</sub>. The maximum operating capacity of this press is 22.74 million square inches per hour.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
004	M-2	30	2	NA	NA

#### Enforcement Issues

- a) ERMD is aware that this facility was constructed prior to the receipt of the proper permit.
- b) ERMD is reviewing this matter and will take appropriate action. The proposed FESOP modification will satisfy the requirements of the construction permit rule 326 IAC 2-1-3 and IAPCB Reg. IX-1.

#### 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 April 15, 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 one lithographic press identified as emission unit M-2:

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	0	0
Particulate Matter (PM10)	0	0
Sulfur Dioxide (SO <sub>2</sub> )	0	0
Volatile Organic Compounds (VOC)	Same as Potential	47
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO <sub>x</sub> )	0	0
Single Hazardous Air Pollutant (HAP)	Same as Potential	6
Combination of HAPs	Same as Potential	11

- (a) The potential emissions are the same as the allowable emissions since there is no emissions control equipment utilized and no applicable short term limits on emissions.
- (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<sub>x</sub> 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<sub>x</sub> 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 SO<sub>2</sub>, CO, PM-10 Pb and NO<sub>2</sub>. 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, fugitive emissions are not counted toward determination of PSD, Emission Offset and Part 70 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 <sub>2</sub>	0
VOC	99
CO	0
NO <sub>x</sub>	0

- (a) This existing source is not a major source because the source has been issued a FESOP on December 11, 1996 with a limit of 99 tons per year of VOCs.
- (b) These emissions were based on the FESOP issued to the source on December 11, 1996.

**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 <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)	Single HAP (ton/yr)	Combo HAPs (ton/yr)
Proposed Modification	0	0	0	(1)	0	0	(1)	(1)
Existing FESOP Limits F-097-5450-00107, issued on 12/11/96	99	99	99	99	99	99	9	24
Revised FESOP Limits				(1)			(1)	(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 new lithographic press comply with the existing FESOP limits of 8.02 tons of

VOC per month, 0.67 tons of an individual HAP per month and 1.83 tons of any combination of HAPs per month.

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 since emission unit M-2 is not rotogravure press.

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 since this press is not a publication rotogravure, product and packaging rotogravure, or wide web flexographic printing press. In addition to this source has accepted federally enforceable limits on HAP emissions to less than the major source thresholds.

### **State Rule Applicability**

#### Flexographic Printing 326 IAC 8-5-5

This regulation does not apply since this press is a not a flexographic press.

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

Emission unit M-2 is subject to the New Facilities; General Reduction Requirements Regulation 326 IAC 8-1-6 since this press has potential emissions greater than 25 tons of VOC per year, is not regulated under any other provisions under article 8 and was installed after January 1, 1980. However Queens Group Inc. has opted to limit the VOC emissions from emission unit M-2 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 new presses identified as emissions unit M-2

is less than 10 ton per year of an individual HAP and 25 tons of any combination of HAPs, consequently 326 IAC 2-1-3.3 does not apply.

- b) The HAP emissions from the new press will be limited by the existing HAP limits of 0.67 tons per month for any individual HAP and 1.83 tons per month for any combination of HAPs.

### **Additional FESOP Changes Requested**

In December of 1997 and April of 1997 Queens Group requested the following additional changes to their FESOP;

- a) the removal of two Hiedelberg Non-heat Set Sheet Fed Offset Lithographic Press, identified as emission units HB-1 and HB-2, and
- b) change in company name from Queens Group Indiana, Inc. to Queens Group, Inc.

### **Comments During 30 Day Public Comment Period**

During the 30 day Pubic Comment Period ERMD received one comments form IDEM OMA:

1. 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.

Since this emission unit is already installed there is no need to have a separate D section which contains construction permit requirements for the new press.

### **FESOP Permit Changes**

#### **Section A**

- a) Condition A.1 General Information - The Nonattainment Status was changed from nonattainment for SO<sub>2</sub> to attainment, because Marion County was recently re-designated as attainment.
- b) Condition A.2 Emission Unit and Pollution Control Summary - the description of the emissions units was changed to incorporate the addition of the new press identified as emission unit M-2 and the elimination of two existing presses identified as emission units HB-1 and HB-2.
- c) Condition A.3 was revised to reflect the change in the rule cite for the definition of an

insignificant emitting activity from 326 IAC 2-7-1(20) to 326 IAC 2-7-1(21).

- d) Condition A.4 was updated to include standard permit language adopted by IDEM and ERMD.
- e) Condition A.5 Prior Permit Conditions Superseded was added to the FESOP as an update to the standard permit language adopted by IDEM and ERMD.

### **Section B**

- f) The following conditions have been revised to reflect changes to the standard permit language adopted by IDEM, OAM and ERMD.

- B.1 General Requirements (Permit No Defense)
- B.4 Enforceability
- B.5 Termination of Right to Operate
- B.6 Servability
- B.8 Duty to Supplement and Provide Information
- B.11 Certification
- B.12 Annual Compliance Certification
- B.13 Preventive Maintenance Plan
- B.14 Emergency Provisions
- B.15 Deviations from Permit Requirements and Conditions
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal
- B.19 Minor Permit Amendment
- B.20 Significant Permit Modification
- B.21 Permit Revisions Under Economic Incentives and Other Programs
- B.22 (now renumbered B.23) Operational Flexibility
- B.23 (now renumbered B.24) Construction Permit Requirements
- B.25 (now renumbered B.27) Annual Fee Payment

- g) ERMD has added the following new condition to the FESOP to reflect the standard permit language adopted by IDEM, OAM and ERMD:

- B.26 Transfer of Ownership
- B.22 Changes Under Section 502(b)(10) of the Clean Air Act
- B.28 Enhanced New Source Review

### **Section C**

- h) The following conditions have been revised to reflect changes to the standard permit language adopted by IDEM, OAM and ERMD.

- C.1 Overall Source Limit [326 IAC 2-8],
- C.5 (renumbered C.6) Operation of Equipment [326 IAC 2-8-5(a)(4)],
- C.6 (renumbered C.8) Performance Testing ,
- C.8 (renumbered C.10) Maintenance of Monitoring Equipment [326 IAC 1-6],
- C.10 (renumbered C.14) Failure to Take Corrective Action ,

C.11 (renumbered C.15) Action Related to Noncompliance Demonstration by Stack Test,  
C.12 (renumbered C.16) Emissions Reporting [326 IAC 2-6],  
C.13 (renumbered C.17) Monitoring Data Availability,  
C.14 (renumbered C.18) General Record Keeping Requirements and  
C.15 (renumbered C.19) General Reporting Requirements

- i) ERMD has added the following new conditions to the FESOP to reflect the standard permit language adopted by IDEM, OAM and ERMD:

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2(3)]  
C.7 Asbestos Abatement Projects -Accreditation [326 IAC 14-10][326 IAC 18-1]  
C.12 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18-1][40 CFR 61.140]  
C.13 Risk Management Plan [326 IAC2-8-4][40 CFR 68.215]  
C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

- j) ERMD has removed conditions C.11, C.12, and C.13 from the permit. The requirements of these conditions can now be found in Conditions D.1.4 Recordkeeping and D.1.5 Reporting.

#### **Section D.1**

- k) Description of the facility was changed to reflect the addition of the new press, identified as emission unit M-2 and the removal of two (2) presses, identified as emission units HB-1 and HB-2.
- l) Condition D.1.1 Volatile Organic Compounds was broken into two conditions. Condition D.1.1 for the FESOP limit of 9.02 tons of VOC per month and condition D.1.2 for the limits taken avoid applicability of the General VOC Reduction Requirements in 326 IAC 8-1-6. In addition, conditions D.1.1 and D.1.2 were modified to reflect the inclusion of the new press identified as emissions unit M-2 and the removal of two (2) presses identified as emission units HB-1 and HB-2.
- m) Condition D.1.1 Volatile Organic Compounds (c) was eliminated since 326 IAC 8-1-6 applies only to new construction after 1/1/80 and not modifications.
- n) Condition D.1.2 (renumbered D.1.3) Hazardous Air Pollutants, was moved from section C and revised to reflect the addition of the new press, identified as emission unit M-2 and the removal of two (2) presses, identified as emission units HB-1 and HB-2.
- o) Condition D.1.3 Preventive Maintenance Plan (PMP) was removed from the permit per IDEM's PMP applicability guidance memo. Since none of the individual emitting units are equipped with control equipment and the uncontrolled actual VOC emissions from each of the individual emitting units is less than 25 tons per year, no PMP is required.
- p) New Condition D.1.3 (renumbered D.1.4) Compliance Determination for Volatile Organic Compounds and Hazardous Air Pollutants, was added to the permit. This condition was necessary to specify how compliance with conditions D.1.1 and D.1.2 are to be determined.

- q) Condition D.1.4 (renumbered D.1.5) Record keeping, was revised to incorporate record keeping requirements for HAPs, and requirements to keep records in accordance with the general record keeping requirements in Section C.
- r) Condition D.1.5 (renumbered D.1.6) was revised to include quarterly reporting of HAPs.

**Reporting Form**

- s) The quarterly reporting forms have been modified to reflect the addition of the new press, identified as emission unit M-2 and the removal of two (2) presses, identified as emission units HB-1 and HB-2. The certification form and deviation occurrence report from have been revised to reflect the new format adopted by IDEM and ERMD. A new quarterly compliance report form summarizing the number and type of deviations has also been added to the permit. This reporting form has been adopted by IDEM and ERMD as part of the new FESOP format.

**Limited Potential to Emit**

The revised table of Limited Potential to Emit is provided below:

Limited Emissions (tons/year)						
Process/facility	PM	SO2	VOC	CO	NOx	HAPS
M-1	0.00	0.00	24 tons for each facility (except the pre-press area) such that 326 IAC 8-1-6 shall not apply as long as the VOC emissions from all facilities combined does not exceed 96.24 tons such that 326 IAC 2-7 shall not apply	0.00	0.00	8.04 tons for an individual HAP and 21.96 tons for any combination of HAPs
P-8	0.00	0.00		0.00	0.00	
P-9	0.00	0.00		0.00	0.00	
M-2	0.00	0.00		0.00	0.00	
H-3	0.00	0.00		0.00	0.00	
Pre Press	0.00	0.00		0.00	0.00	
Insignificant	2.61	0.00	2.76 tons	0.00	0.00	0.96 ton for an individual HAP 2.04 tons for any combination of HAPs
Total	2.61	0.00	99 tons	0.00	0.00	9 tons of an individual HAP 24 tons of a combination of HAPs

Queens Group of Indiana has submitted a construction permit application for the addition of a new press (M-2) and the removal of an existing press (HB-1) Since the potential emissions are greater than 25 tons per year this modification is treated as a significant modification.

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	Throughput MMin <sup>2</sup> /YEAR (1)
M-2	616.93	12	51.1875	60	8760	1000000	199176

(1) Throughput = Maxium line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin<sup>2</sup> per Year

PTE for VOCs

Compound Name Compound with highest VOC	Maxium Coverage lbs/ MMin <sup>2</sup>	Weight % Volatiles*	Flash Off %	Through Put MMin <sup>2</sup> / Year	Tons 2000 lbs	Maximum % Operation Time (1)	Tons Year (2)
Fountain Solution Isopropyl Alcohol	0.62	99.00%	100.00%	199175.73	2000	39.60%	24.21
Inks INX Infra B/P Revlon Grey	2.89	33.40%	5.00%	199175.73	2000	39.60%	1.90
Surface Coating NCO1249S	3.92	8.50%	100.00%	199175.73	2000	39.60%	13.14
Blanket Wash Hoosier #2039	0.67	99.00%	100.00%	199175.73	2000	12.50%	8.26

**Total VOC 47.51**

(1) Percentage operating time is based on historic data (Prep Time is: 47.9%, Run Time 39.9%, and Cleanup Time is 12.5%)

(2) VOC = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) \* Flash off \* Throughput \* Tons per 2000 pounds \* % Max. Operation = Tons per Year

PTE for HAPs

Compound Name	HAPS	Maxium Coverage lbs/ MMin <sup>2</sup>	% HAP	Flash Off %	Maximum % Operation Time (1)	Tons Year
UV Curable (Ink)	Toluene	2.89	0.50%	5.00%	39.60%	0.03
Take-It-Off	Ethylene Glycol Methyl Ether	0.67	5.00%	100.00%	12.50%	0.42
	Ethylene Glycol	0.67	3.00%	100.00%	12.50%	0.25
Allied Meter-X	Methylene Chloride	0.67	70.00%	100.00%	12.50%	5.84
	Cumene	0.67	4.00%	100.00%	12.50%	0.33
	Xylene	0.67	5.00%	100.00%	12.50%	0.42
RBP U.V. Wash	2-Butoxyethanol	0.67	50%	100.00%	12.50%	4.17
	Xylene	0.67	1%	100.00%	12.50%	0.08
<b>Total HAP</b>						<b>11.54</b>

PTE for PM-10

Compound	Maxium Coverage lbs/ MMin <sup>2</sup>	Through Put MMin <sup>2</sup> / Year	Tons 2000 lbs	Maximum Opera Time	Tons Year
Spray Powder	0.0165	199176	2000	39.60%	0.65