

# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

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

**Creative Expressions Group, Inc.  
3500 North Arlington  
Indianapolis, Indiana 46218**

(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 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F097-6366-00155	
Issued by: Dr. Robert F. Holm, Administrator, ERMD	Issuance Date:
First Significant Permit Modification: SMF097-9488-00155	Affected Pages: 4, 9, 16, 19, 21 and 23 Pages 5a and 5b supersede Page 5 Pages 10a and 10b supersede Page 10 Pages 17a and 17b supersede Page 17 Pages 20a and 20b supersede Page 20 Pages 22a through 22e supersede Page 22 Pages 25a and 25b supersede Page 25 Pages 26a and 26b supersede Page 26
Issued by: Dr. Robert F. Holm, Administrator, ERMD	Issuance Date:

## SECTION A SOURCE SUMMARY

### A.1 General Information [326 IAC 2-8-4]

The Permittee owns and operates a paper printing company.

Responsible Official: Fred Franz  
Source Address: 3500 North Arlington Avenue, Indianapolis, Indiana 46218  
Mailing Address: 7240 Shadeland Station, Suite 300, Indianapolis, Indiana 46256-3928  
SIC Code: 2679  
County Location: Marion County  
County Status: Nonattainment for TSP  
Source Status: Minor Source, under PSD and Emission Offset Rules

### A.2 Emission Units and Pollution Control Summary [326 IAC 2-8-4]

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

- (a) Flexographic printing press, identified as emission unit 2 with a maximum line speed of 966 feet per minute and a printing width of 13 inches. This unit was installed in 1984.
- (b) Flexographic printing press, identified as emission unit 3 with a maximum line speed of 590 feet per minute and a printing width of 13 inches. This unit was installed in 1989.
- (c) Flexographic printing press, identified as emission unit 4 with a maximum line speed of 590 feet per minute and a printing width of 13 inches, This unit was installed in 1989.
- (d) Flexographic printing press, identified as emission unit 5 with a maximum line speed of 362 feet per minute and a printing width of 17 inches, This unit was installed in 1965.
- (e) Flexographic printing press, identified as emission unit 9 with a maximum line speed of 576 feet per minute and a printing width of 10 inches, This unit was installed in 1988.
- (f) Flexographic printing press, identified as emission unit 11 with a maximum line speed of 987 feet per minute and a printing width of 10 inches, This unit was installed in 1994.
- (g) Flexographic printing press, identified as emission unit 12 with a maximum line speed of 1256 feet per minute and a printing width of 17 inches, This unit was installed in 1994.
- (h) Flexographic printing press, identified as emission unit 40 with a maximum line speed of 306 feet per minute and a printing width of 30.75 inches, This unit was installed in 1950.
- (i) Flexographic printing press, identified as emission unit 44 with a maximum line speed of 445 feet per minute and a printing width of 30.75 inches, This unit was installed in 1992. This unit exhausts to stack 44
- (j) Flexographic printing press, identified as emission unit 70 with a maximum line speed of 300 feet per minute and a printing width of 30.375 inches, This unit was installed in 1980. This unit exhausts to stacks 70 and 70A.

- (k) Flexographic printing press, identified as emission unit 82 with a maximum line speed of 800 feet per minute and a printing width of 34.374 inches. This printer is equipped with two dryers. These dryers are the between color dryer and overhead dryer. These dryers are fired with natural gas and have heat input capacities of 0.8 million Btu per hour each. Emissions are exhausted out two stacks identified as S82A and S82B. This press was installed in 1997.
- (l) One (1) paper plate coating machine, 71. This unit does not possess pollution control devices, This unit was installed in 1984. It exhausts to stacks 71 and 71A.
- (m) One (1) photopolymer washout unit, 30. This unit does not possess pollution control equipment, This unit was installed in 1994. It exhausts to stack 30.
- (n) One (1) coating unit identified as emission unit 82a, the coating unit is equipped with one dryer. This dryer is fired with natural gas and has a heat input capacity of 1.5 million Btu per hour. Emissions from the dryer are exhausted out on stack identified as S82C.
- (o) Flexographic printing press, identified as emission unit 14 with a maximum line speed of 1,000 feet per minute and printing a width of 26 inches. The emissions from this emission unit exhaust out one stack identified as S14.
- (p) Flexographic printing press, identified as emission unit 15 with a maximum line speed of 1,000 feet per minute and a printing width of 26 inches. The emissions from this emission unit exhaust out one stack identified as S15.

A.3 Insignificant Activities [326 IAC 2-8-4]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) One (1) 0.32 million Btu natural gas-fired boiler
- (b) Propane or liquefied petroleum gas-fired combustion sources
- (c) Combustion source flame safety purging on startup
- (d) Machining
- (e) Welding
- (f) Heating and cooling systems
- (g) Cooling tower (not regulated under NESHAP)
- (h) Paved roads and parking lots
- (i) Maintenance line and vessel purging
- (j) Blowdown from water systems
- (k) Paper plate forming machines
- (l) Napkin folding machines
- (m) Cup bagging machine
- (n) Degreasing operations (less than 145 gallons per year)
- (o) Cleaners and solvents (less than 145 gallons per year)

Only activities m, n, and o emit volatile organic compounds (VOCs). This has been taken into account when setting limits for this source.

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 City of Indianapolis, Environmental Resource Management Division (ERMD), and the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) 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.

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
  - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
  - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) Preventive Maintenance Plans shall be submitted to ERMD and IDEM, OAM, upon request and shall be subject to review and approval by ERMD and IDEM, OAM.

B.14 Emergency Provision [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 as follows:
- (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 of 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 any emergency or upset provision contained in 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) ERMD and IDEM, OAM, may require that the preventive maintenance plan required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

- (f) Failure to notify ERMD by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency 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.

- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-0179 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.26 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). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity

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:

- (a) Visible emissions shall not exceed an average of 30% opacity in 24 consecutive readings,
- (b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

#### C.3 Open Burning

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.

#### C.4 Fugitive Dust Emissions

The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated.

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

- (a) All equipment that potentially might emit pollutants into the ambient air shall be properly operated and maintained.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
- (c) The permittee shall perform all necessary maintenance and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times.

- (2) Delivered by any other method if it is received and stamped by receiving agency, on or before the date it is due.

C.8 Monitoring Data Availability

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. Records shall be kept of the times that the equipment is not operating. 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. 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. At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed 5% of the operating time in any quarter. Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason.

C.9 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.10 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  
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.

## SECTION D.1 FACILITY OPERATION CONDITIONS

- (a) Flexographic printing press, identified as emission unit 2 with a maximum line speed of 966 feet per minute and a printing width of 13 inches. This unit was installed in 1984.
- (b) Flexographic printing press, identified as emission unit 3 with a maximum line speed of 590 feet per minute and a printing width of 13 inches. This unit was installed in 1989.
- (c) Flexographic printing press, identified as emission unit 4 with a maximum line speed of 590 feet per minute and a printing width of 13 inches, This unit was installed in 1989.
- (d) Flexographic printing press, identified as emission unit 5 with a maximum line speed of 362 feet per minute and a printing width of 17 inches, This unit was installed in 1965.
- (e) Flexographic printing press, identified as emission unit 9 with a maximum line speed of 576 feet per minute and a printing width of 10 inches, This unit was installed in 1988.
- (f) Flexographic printing press, identified as emission unit 11 with a maximum line speed of 987 feet per minute and a printing width of 10 inches, This unit was installed in 1994.
- (g) Flexographic printing press, identified as emission unit 12 with a maximum line speed of 1256 feet per minute and a printing width of 17 inches, This unit was installed in 1994.
- (h) Flexographic printing press, identified as emission unit 40 with a maximum line speed of 306 feet per minute and a printing width of 30.75 inches, This unit was installed in 1950.
- (i) Flexographic printing press, identified as emission unit 44 with a maximum line speed of 445 feet per minute and a printing width of 30.75 inches, This unit was installed in 1992. This unit exhausts to stack 44
- (j) Flexographic printing press, identified as emission unit 70 with a maximum line speed of 300 feet per minute and a printing width of 30.375 inches, This unit was installed in 1980. This unit exhausts to stacks 70 and 70A.
- (k) Flexographic printing press, identified as emission unit 82 with a maximum line speed of 800 feet per minute and a printing width of 34.374 inches. This printer is equipped with two dryers. These dryers are the between color dryer and overhead dryer. These dryers are fired with natural gas and have heat input capacities of 0.8 million Btu per hour each. Emissions are exhausted out two stacks identified as S82A and S82B. This press was installed in 1997.
- (l) One (1) paper plate coating machine, 71. This unit does not possess pollution control devices, This unit was installed in 1984. It exhausts to stacks 71 and 71A.
- (m) One (1) photopolymer washout unit, 30. This unit does not possess pollution control equipment, This unit was installed in 1994. It exhausts to stack 30.
- (n) One (1) coating unit identified as emission unit 82a, the coating unit is equipped with one dryer. This dryer is fired with natural gas and has a heat input capacity of 1.5 million Btu per hour. Emissions from the dryer are exhausted out on stack identified as S82C.

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

#### D.1.1 Volatile Organic Compounds and Hazardous Air Pollutants [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 the amount of VOCs and HAPs delivered to the flexographic printing presses, identified as emissions units 2, 3, 4, 5, 9, 11, 12, 40, 44, 70, and 82, paper coating machine, identified as emission unit 71 and 82a, and through the photopolymer washout unit, identified as emission unit 30, including the amount of VOCs and HAPs used for clean-up plus the amount of VOCs and HAPs delivered to the flexographic printing presses identified in section D.2, including VOC and HAP emissions from cleaning shall be limited to:

- (a) 7.83 tons of VOCs per month.

- (b) 0.75 tons of any individual HAP per month.
- (c) 2.0 tons of any combination of HAPs per month.

Therefore, the requirements of 326 IAC 2-7, and 326 IAC 20 (40 CFR Part 63 Subpart KK) do not apply.

**D.1.2 Surface Coating for Paper Operations [326 IAC 8-2-5]**

Pursuant to 326 IAC 8-2-5 (Surface Coating for Paper Operations), the volatile organic compound (VOC) content of coatings as applied using the coating units identified as emission units 71, and 82a shall be limited to 2.9 pounds of VOC per gallon of coating less water, as delivered to the applicator.

**D.1.3 Coating Limitations for Flexographic Presses [326 IAC 8-5-5]**

Pursuant to 326 IAC 8-5-5(c)(2) (Flexographic Printing Operations), the inks applied on the following flexographic presses identified as emission units 2, 3, 4, 5, 9, 11, 12, 40, 44, 70, and 82 shall contain sixty percent (60%) by volume or more nonvolatile material less water, as applied to substrate.

**Compliance Determination**

**D.1.4 Volatile Organic Compounds [326 IAC 8-1-4]**

Compliance with the VOC contents limits contained in conditions D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating or ink manufacturer. However ERMD and IDEM, OAM reserves the authority to determine compliance using method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

**D.1.5 Record Keeping Requirement**

- (a) To document compliance with condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with conditions D.1.1.
  - (1) The weight of VOC and HAP containing materials used, including purchase orders and invoices necessary to verify the type and amount used;
  - (2) The VOC and HAP content (weight percent) of each material used;
  - (3) The weight of VOCs and HAPs emitted for each compliance period, considering capture and control efficiency, if applicable.
- (b) To document compliance with condition D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with conditions D.1.2 and D.1.3.

- (1) The name and identification number for each coating as applied.
  - (2) A record of the pounds of VOC per gallon of coating less water, as delivered to the applicator or the volume of nonvolatile material less water, as applied to substrate as necessary to determine compliance for each coating used.
  - (3) As new compliant coatings are added the records required by this condition shall be updated to include the new coating.
  - (4) If a coating is discontinued, the records required by this condition shall be maintained consistent with the general record keeping requirements in section C of this permit.
- (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 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.

## SECTION D.2

## FACILITY CONDITIONS

This installation is limited to the construction and operation of the following equipment:

- o) Flexographic printing press, identified as emission unit 14 with a maximum line speed of 1,000 feet per minute and printing a width of 26 inches. Emissions are exhausted out one stack identified as S14.
- p) Flexographic printing press, identified as emission unit 15 with a maximum line speed of 1,000 feet per minute and a printing width of 26 inches. Emissions are exhausted out one stack identified as S15.

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

and

Environmental Resources Management Division  
Air Quality Management Section, Compliance Data  
2700 South Belmont Avenue  
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**

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

##### **D.2.6 Volatile Organic Compounds and Hazardous Air Pollutants [326 IAC 2-8-4]**

Pursuant to 326 IAC 2-8-4 the amount of VOCs and HAPs delivered to the flexographic printing presses identified as emission units 14 and 15, including VOC and HAP emissions from cleaning plus the amount of VOCs and HAPs delivered to the emissions units identified in section D.1, including the amount of VOCs and HAPs used for clean-up the shall be limited to:

- (a) 7.83 tons of VOCs per month.
- (b) 0.75 tons of any individual HAP per month.
- (c) 2.0 tons of any combination of HAPs per month.

Therefore, the requirements of 326 IAC 2-7, and 326 IAC 20 (40 CFR Part 63 Subpart KK) do not apply.

##### **D.2.7 Coating Limitations for Flexographic Presses [326 IAC 8-5-5]**

Pursuant to 326 IAC 8-5-5(c)(2) (Flexographic Printing Operations), the inks applied on the following flexographic presses identified as emission units 14, and 15 shall contain (60%) by volume or more nonvolatile material less water, as applied to substrate.

#### **Compliance Determination**

##### **D.2.8 Volatile Organic Compounds [326 IAC 8-1-4]**

Compliance with the VOC contents limits contained in conditions D.2.7 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the ink manufacturer. However ERMD and IDEM, OAM reserves the authority to determine compliance using method

24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### **D.2.9 Record Keeping Requirement**

- (a) To document compliance with condition D.2.6, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with conditions D.1.1.
- (1) The weight of VOC and HAP containing materials used, including purchase orders and invoices necessary to verify the type and amount used;
  - (2) The VOC and HAP content (weight percent) of each material used;
  - (3) The weight of VOCs and HAPs emitted for each compliance period, considering capture and control efficiency, if applicable.
- (b) To document compliance with condition D.2.7, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with conditions D.1.2 and D.1.3.
- (1) The name and identification number for each coating as applied.
  - (2) A record of the volume of nonvolatile material less water, as applied to substrate for each coating used.
  - (3) As new compliant coatings are added the records required by this condition shall be updated to include the new coating.
  - (4) If a coating is discontinued, the records required by this condition shall be maintained consistent with the general record keeping requirements in section C of this permit.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.2.10 Quarterly Reporting**

That a quarterly summary to document compliance with operation condition number D.1.1 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.

## SECTION D.3 FACILITY OPERATION CONDITIONS

One (1) 0.32 million Btu natural gas-fired boiler.

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

#### D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from the 0.32 million Btu per hour boiler shall be limited to 0.6 pounds per million Btu per hour.

**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: Creative Expressions Group, Inc  
Source Address: 3500 North Arlington Avenue, Indianapolis, Indiana 46218  
Mailing Address: 7240 Shadeland Station, Suite 300, Indianapolis Indiana 46256-3928  
FESOP No.: F097-6366-00155

**This form consists of 2 pagesPage 1 of 2**

Check either No. 1 or No.2
<b>9 1.</b> This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the ERMD and OAM, within four <b>(4)</b> business hours; and CThe Permittee must submit notice in writing or by facsimile to ERMD and OAM within two <b>(2)</b> days, and follow the other requirements of 326 IAC 2-8-12
<b>9 2.</b> This is a deviation, reportable per 326 IAC 2-8-4(3)(C) CThe Permittee must submit notice in writing within ten <b>(10)</b> 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: Creative Expressions Group, Inc  
Source Address: 3500 North Arlington Avenue, Indianapolis, Indiana 46218  
Mailing Address: 7240 Shadeland Station, Suite 300, Indianapolis Indiana 46256-3928  
FESOP No.: F097-6366-00155  
Facility: 2, 3, 4, 5, 9, 11, 12, 14, 15, 30, 40, 44, 70, 71, 82 and 82a  
Parameter: VOCs, and HAPs  
Limit: 7.83 tons of VOCs per month, 2.0 tons per month of Total HAPs, 0.75 tons per year of single HAP used in the greatest quantity

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

<b>Month</b>	<b>VOC Use (tons/month)</b>	<b>Greatest Single HAP Usage (tons/month)</b>	<b>Combination HAPs Usage (tons/month)</b>

9 No deviation occurred in this month.

9 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: Creative Expressions Group, Inc  
Source Address: 3500 North Arlington Avenue, Indianapolis, Indiana 46218  
Mailing Address: 7240 Shadeland Station, Suite 300, Indianapolis Indiana 46256-3928  
FESOP No.: F097-6366-00155

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:**

<b>Requirement</b> (eg. Permit Condition D.1.3)	<b>Number of</b> <b>Deviations</b>	<b>Date of each</b> <b>Deviations</b>	<b>No</b> <b>Deviations</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**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:** Creative Expressions Group, Inc.  
**Source Location:** 3500 North Arlington, Indianapolis Indiana 46218  
**County:** Marion  
**SIC Code:** 2679  
**Operating Permit No.:** F097-6366-00155  
**Modification Tracking No.:** SMF-097-9488-00155

The Environmental Resources Management Division (ERMD) has reviewed an application from Creative Expressions Inc. relating to the construction and operation of two flexographic presses:

- (a) Flexographic printing press, identified as emission unit 14 with a maximum line speed of 1,000 feet per minute and printing a width of 26 inches. Emissions are exhaust out one stack identified as S14.
- (b) Flexographic printing press, identified as emission unit 15 with a maximum line speed of 1,000 feet per minute and a printing width of 26 inches. Emissions are exhaust out one stack identified as S15.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S14	Flexographic Press	35	0.83	1,450	220
S15	Flexographic Press	35	0.83	1,450	220

**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 January 26, 1998.

**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 flexographic presses identified as emission units 14 and 15 only:

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)	12	12
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO <sub>x</sub> )	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 and the applicant proposed to use only compliant coatings pursuant to 326 IAC 8-5-5.
- (b) Allowable emissions (as defined in the Indiana Rule) of VOC are greater than 15 pounds per day and less than 25 tons per year. Therefore, pursuant to IAPCB Reg. IX-1, a construction permit is required. This approval satisfies the requirements of 326 IAC 2-1-2.

### 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, 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 <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	12 <sup>(1)</sup>	0	0	<1 <sup>(1)</sup>	<1 <sup>(1)</sup>
Existing FESOP Limits F-000-0000, issued on 12/11/96	99	99	99	94	99	99	9	24
Revised FESOP Limits				94			9	24
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 flexographic presses comply with the existing FESOP limits of 7.83 tons of VOC per month, 2 tons per month for a combination of HAP and 0.75 tons per month for any single HAP for all significant emitting units combined.

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 14 and 15 are flexographic presses and not rotograver 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. Pursuant to 40 CFR Part 63.822 wide web flexographic presses means a flexographic press capable of printing substrate greater than 18 inches in width. Emission units 14 and 15 are classified as wide web flexographic presses. The NESHAP 40 CFR Part 63 Subpart KK is not applicable to these emissions units since the source has accepted federally enforceable limits on HAP emissions of less than 9 tons per twelve month period for any single HAP and 24 tons per twelve month period for any combination of HAPs.

### **State Rule Applicability**

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

Since the source has potential VOC emissions greater than 25 tons per year, the flexographic presses identified as emission units 13, and 14 must comply with the requirement of 326 IAC 8-5-5. Creative Expressions Group, Inc. has indicated that they will be complying with 326 IAC 8-5-5 by using compliant coating which meet the specifications of 326 IAC 8-5-5(c)(2). A check of the MSDS included in the application shows compliance with coating requirements of 326 IAC 8-5-5(c)(2).

### **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 13 and 14 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 new flexographic presses will be comply with the existing FESOP HAP limit of 2 tons per month for any combination of HAPs and 0.75 tons of any individual HAP for all significant emitting units combined.

### **Additional FESOP Changes Requested**

On January 26, 1998 Creative Expressions Group Inc. requesting certain changes to the permit. This modification also involves the following additional changes.

- a) The addition of new equipment installed under construction permit CP9700155-01 to the FESOP. This construction permit was issued on March 18, 1997 for the installation of a flexographic press and a coating machine identified as emission units 82 and 82a.
- b) The removal of two (2) flexographic presses identified as emission units 6 and 10 from the FESOP.

### **FESOP Permit Changes**

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

- a) Condition A.2 Emission Units and Pollution Control Summary (pages 4 and 5) was revised to incorporate the addition of the three flexographic presses identified as emission units 14, 15 and 82 and the coating machine identified as emission unit 82a.
- b) Condition A.5 Prior Permit Conditions Superseded (page 5) was added to the permit. This condition was added to nullify the requirements of CP-9700155-01.
- c) Condition B.14 Emergency Provisions (pages 9, 10a and 10b) was revised to reflect the current permit language adopted by IDEM and ERMD.
- d) Condition B.26 Enhanced New Source Review (page 16) was added as general permit language adopted by IDEM and ERMD.
- e) Condition C.1 Overall Source Limit (page 17a) was revised to reflect updated permit language adopted by IDEM and ERMD.
- f) Condition C.9 General Record Keeping Requirements (page 19 and 20a) was revised to reflect updated permit language adopted by IDEM and ERMD.
- g) Condition C.10 General Reporting Requirement (page 20a and 20b) was revised to reflect updated permit language adopted by IDEM and ERMD.
- h) The description of emission units in Section D.1 was revised to reflect the additions and deletion of equipment.
- i) Condition D.1.1 Volatile Organic Compounds and Hazardous Air Pollutants (pages 21 and 22) has been revised to incorporate the emission units in section D.2. The requirements to comply with 326 IAC 8-5-5 and 8-2-5 were taken out of this condition and put into new separate conditions under D.1.2 and D.1.3
- j) Former condition D.1.2 Preventative Maintenance Plan was deleted since none of the

individual emission units have actual emissions greater than 25 tons per year and there is no add-on control used.

- k) Condition D.1.4 Volatile Organic Compounds under the heading of compliance determination (page 22a and 22b) was necessary to specify the methods for determining compliance with the coating requirements.
- l) Condition D.1.5 Record Keeping Requirement (page 22a and 22b) was revised to include section (b). This section was necessary to comply with record keeping requirements specified 326 IAC 8-1-10.
- m) Section D.2 (pages 22a through 22e) was added to the permit. former Section D.2 for insignificant emitting activities was renumber section D.3. The new section D.2 incorporates all the conditions two new flexographic presses, identified as emission units 14 and 15.
- n) The Deviation Occurrence Reporting Form on page 25 was replaced by a two page Emergency/Deviation Report Form the page numbers were changed to 25a and 25b. This new report form was added to allow for the standardized reporting of emergency occurrences.
- o) The Quarterly Report Form on page 26 was revised to reflect the changes to the emission units. The new page number is page 26a.
- p) A new Quarterly Deviation Summary Report Form was added to the permit on page 26b. The new report form is a standard requirement for all FESOPs.

**Limited PTE**

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

The source has accepted a limit of 9 tons per year for any single HAP and 24 tons per year for any combination of HAPs.

Process/ facility	Limited PTE (tons/year)						
	PM	PM-10	SO2	VOC	CO	NOx	HAPs
Flexographic Presses 2, 3, 4, 5, 9, 11, 12, 14, 15, 40, 44, 70, 82; Coating Machines 71 and 82a; Polymer washout unit 30	0.0	0.0	0.0	94.0	0.0	0.0	24.0 total HAPs 9.0 single HAP
VOC related insignificant activities	0.0	0.0	0.0	5.0	0.0	0.1	
Total Emissions	0.0	0.0	0.0	99.0	0.0	0.1	24.0 total HAPs 9.0 single HAP

Creative Expressions Has Submitted a Permit application to install two (2) new presses, since the potential VOC emissions from these presses are less than 10 tons per year each they are exempt from 326 IAC 8-5-5 pursuant to (c)(1) of this regulation.

Process Information							
Press I.D.	MAXIMUM LINE SPEED FEET MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	HR/YEAR	1/1000000	MMin <sup>2</sup> /YEAR
Flexographic Press 14	1000	12	26	60	8760	1000000	163987
Pollutant: Volatile Organic Compounds							
Material Name	Maxium Coverage lbs/ MMin <sup>2</sup>	Weight % Volatiles*	Flash Off %	Through Put MMin <sup>2</sup> / Year	Tons 2000 lbs	Tons Year	
Water Based Inks (1)	2.3	3%	100.00%	163987	2000	5.66	
Cleanup (737 lbs/yr Potential)	NA	100%	100.00%	NA	2000	0.37	
						<b>Total Emissions</b>	<b>6.03</b>
Pollutant: Hazardous Air Pollutants							
HAP Name	Maxium Coverage lbs/ MMin <sup>2</sup>	Weight % Volatiles* HAPs	Flash Off %	Through Put MMin <sup>2</sup> / Year	Tons 2000 lbs	Tons Year	
Acrylic Acid (1)	2.3	0.21%	100.00%	163987.2	2000	0.40	
Styrene (1)	2.3	0.004%	100.00%	163987.2	2000	0.01	
Methanol (2)	NA	4.00%	100.00%	NA	2000	0.01	
Process Information							
Press I.D.	MAXIMUM LINE SPEED FEET MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	HR/YEAR	1/1000000	MMin <sup>2</sup> /YEAR
Flexographic Press 15	1000	12	26	60	8760	1000000	163987
Pollutant: Volatile Organic Compounds							
Material Name	Maxium Coverage lbs/ MMin <sup>2</sup>	Weight % Volatiles*	Flash Off %	Through Put MMin <sup>2</sup> / Year	Tons 2000 lbs	Tons Year	
Water Based Inks (1)	2.3	3%	100.00%	163987	2000	5.66	
Cleanup (737 lbs/yr Potential)	NA	100%	100.00%	NA	2000	0.37	
						<b>Total Emissions</b>	<b>6.03</b>
Pollutant: Hazardous Air Pollutants							
HAP Name	Maxium Coverage lbs/ MMin <sup>2</sup>	Weight % Volatiles* HAPs	Flash Off %	Through Put MMin <sup>2</sup> / Year	Tons 2000 lbs	Tons Year	
Acrylic Acid (1)	2.3	0.21%	100.00%	163987.2	2000	0.40	
Styrene (1)	2.3	0.004%	100.00%	163987.2	2000	0.01	
Methanol (2)	NA	4.00%	100.00%	NA	2000	0.01	