



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Minor Source Operating Permit (MSOP)

for Litho Press, Inc. in Marion County

MSOP Renewal No.: M097-47888-00657

The Indiana Department of Environmental Management (IDEM) has received an application from Litho Press, Inc. located at 1747 Massachusetts Ave, Indianapolis, IN 46201 for a renewal of its MSOP issued on November 20, 2019. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Litho Press, Inc. to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM's preliminary findings have been sent to:

Indianapolis Public Library - Central Library Branch
40 E St. Clair St.
Indianapolis, IN 46204

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <https://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

This notice is posted on IDEM's website (<https://www.in.gov/idem/public-notices/>). The date that this notice is posted on IDEM's website marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If IDEM decides to conduct a public hearing and/or public meeting, IDEM will post a separate announcement of the date, time, and location of that public hearing and/or public meeting on IDEM's website (<https://www.in.gov/idem/public-notices/>). At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M 097-47888-00657 in all correspondence.

Comments should be sent to:

Pratim Moulik
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Pratim Moulik or (317) 234-6871
Or dial directly: (317) 234-6871
Fax: (317) 232-6749 attn: Pratim Moulik
E-mail: PMoulik@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Pratim Moulik or my staff at the above address.



Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality



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Eric J. Holcomb
Governor

DRAFT

Brian C. Rockensuess
Commissioner

Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Litho Press, Inc.
1747 Massachusetts Ave
Indianapolis, Indiana 46201**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M097-47888-00657	
Master Agency Interest ID: 19916	
Issued by:	Issuance Date:
Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary lithographic printing operation.

Source Address:	1747 Massachusetts Ave, Indianapolis, Indiana 46201
General Source Phone Number:	(317) 634-6468
SIC Code:	2752 (Commercial Printing, Lithographic, Not Elsewhere Classified)
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) sheet-fed offset lithographic printing press, identified as MR-1, constructed in 2002, with a maximum capacity of 12,000 sheets per hour, uncontrolled, and exhausting to stack S-1 and S-2.
- (b) One (1) sheet-fed offset lithographic printing press, identified as MR-2, constructed in 2015, with a maximum capacity of 11,000 sheets per hour, uncontrolled, and exhausting to stack S-3, S-4, S-5.
- (c) One (1) sheet-fed offset lithographic printing press, identified as MR-3, constructed in 2008, with a maximum capacity of 11,000 sheets per hour, uncontrolled, and exhausting to stack S-6.
- (d) One (1) sheet-fed offset lithographic printing press, identified as MR-4, constructed in 2015, with a maximum capacity of 10,000 sheets per hour, uncontrolled and exhausting to stack S-7 to S-8.
- (e) Seven (7) gas-fired, radiant space heaters, constructed in 2012, with a maximum heat input capacity of 0.2 MMBtu per hour each, uncontrolled, and exhausting indoors.
- (f) One (1) Rheem natural gas-fired furnace, constructed in 2010, with a maximum heat input capacity of 0.12 MMBtu per hour, uncontrolled, and exhausting indoors.
- (g) One (1) Bryant natural gas-fired furnace, constructed in 2005, with a maximum heat input capacity of 0.12 MMBtu per hour, uncontrolled, and exhausting indoors.
- (h) One (1) EFI Inkjet Printer, identified as VUTEck, constructed in 2015, with a maximum capacity of 0.102 million square feet per hour, uncontrolled, and exhausting to stack S-9 and S-10.

- (i) One (1) Parts Washer, constructed in 2015, with a maximum solvent usage of 145 gallons per year, uncontrolled, and exhausting indoors.
- (j) Paved Roads [326 IAC 6-4]

SECTION B GENERAL CONDITIONS

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

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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M097-47888-00657, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M097-47888-00657 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing an administrative amendment. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.15 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

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

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.
- (c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (f) One (1) Rheem natural gas-fired furnace, constructed in 2010, with a maximum heat input capacity of 0.12 MMBtu per hour, uncontrolled, and exhausting indoors.
- (g) One (1) Bryant natural gas-fired furnace, constructed in 2005, with a maximum heat input capacity of 0.12 MMBtu per hour, uncontrolled, and exhausting indoors.
- (i) One (1) Parts Washer, constructed in 2015, with a maximum solvent usage of 145 gallons per year, uncontrolled, and exhausting indoors.

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

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

D.1.1 Particulate Emissions for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions from the Rheem and Bryant natural gas-fired furnace shall be limited to 0.6 pounds per MMBtu heat input, each.

D.1.2 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

- (a) Comply with the following control equipment and operating requirements:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in a manner that would allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Comply with the following additional control equipment and operating requirements:
 - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

- (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (3) If used, solvent spray must be:
- (A) performed in an enclosed chamber, with or without venting; or
 - (B) a solid, fluid stream applied at a pressure that does not cause excessive splashing.

D.1.3 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records must be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
- (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Litho Press, Inc.
Source Address:	1747 Massachusetts Ave
City:	Indianapolis, Indiana 46201
Phone #:	(317) 634-6468
MSOP #:	M097-47888-00657

I hereby certify that Litho Press, Inc. is:

still in operation.

I hereby certify that Litho Press, Inc. is:

no longer in operation.

in compliance with the requirements of MSOP M097-47888-00657.

not in compliance with the requirements of MSOP M097-47888-00657.

Authorized Individual (typed):	
Title:	
Signature:	Date:
Email Address:	Phone:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(a)(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Minor Source Operating Permit (MSOP) Renewal

Source Description and Location

Source Name:	Litho Press, Inc.
Source Location:	1747 Massachusetts Ave, Indianapolis, IN 46201
County:	Marion
SIC Code:	2752 (Commercial Printing, Lithographic, Not Elsewhere Classified)
Permit Renewal No.:	M 097-47888-00657
Permit Reviewer:	Pratim Moulik

On May 29, 2024, Litho Press, Inc. submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Litho Press, Inc. relating to the operation of a stationary lithographic printing operation. Litho Press, Inc. was issued its first MSOP (M 097-41911-00657) on November 20, 2019.

Existing Approvals

The source was issued MSOP Renewal No. M 097-41911-00657 on November 20, 2019. There have been no subsequent approvals issued.

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) sheet-fed offset lithographic printing press, identified as MR-1, constructed in 2002, with a maximum capacity of 12,000 sheets per hour, uncontrolled, and exhausting to stack S-1 and S-2.
- (b) One (1) sheet-fed offset lithographic printing press, identified as MR-2, constructed in 2015, with a maximum capacity of 11,000 sheets per hour, uncontrolled, and exhausting to stack S-3, S-4, S-5.
- (c) One (1) sheet-fed offset lithographic printing press, identified as MR-3, constructed in 2008, with a maximum capacity of 11,000 sheets per hour, uncontrolled, and exhausting to stack S-6.
- (d) One (1) sheet-fed offset lithographic printing press, identified as MR-4, constructed in 2015, with a maximum capacity of 10,000 sheets per hour, uncontrolled and exhausting to stack S-7 to S-8.
- (e) Seven (7) gas-fired, radiant space heaters, constructed in 2012, with a maximum heat input capacity of 0.2 MMBtu per hour each, uncontrolled, and exhausting indoors.
- (f) One (1) Rheem natural gas-fired furnace, constructed in 2010, with a maximum heat input capacity of 0.12 MMBtu per hour, uncontrolled, and exhausting indoors.
- (g) One (1) Bryant natural gas-fired furnace, constructed in 2005, with a maximum heat input capacity of 0.12 MMBtu per hour, uncontrolled, and exhausting indoors.
- (h) One (1) EFI Inkjet Printer, identified as VUTEck, constructed in 2015, with a maximum capacity of 0.102 million square feet per hour, uncontrolled, and exhausting to stack S-9 and S-10.

- (i) One (1) Parts Washer, constructed in 2015, with a maximum solvent usage of 145 gallons per year, uncontrolled, and exhausting indoors.
- (j) Paved Roads [326 IAC 6-4]

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

County Attainment Status

The source is located in Marion County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

Pollutant	Designation
SO ₂	Attainment effective May 21, 2020, for the 2010 SO ₂ primary 1-hour standard for Center, Perry, and Wayne townships. Unclassifiable or attainment effective April 9, 2018, for the remainder of the county. Better than national secondary standards effective March 3, 1978.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Marion County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

The fugitive emissions of regulated air pollutants and hazardous air pollutants (HAP) are counted toward the determination of MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

	Unrestricted Potential Emissions (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Lithographic Press MR-1	0.13	0.13	0.13	-	-	3.45	-	0.02	0.02
Lithographic Press MR-2	0.23	0.23	0.23	-	-	22.61	-	0.13	0.13
Lithographic Press MR-3	0.39	0.39	0.39	-	-	12.68	-	0.07	0.07
Lithographic Press MR-4	0.46	0.46	0.46	-	-	7.40	-	0.04	0.04
VUteck Printer	-	-	-	-	-	0.08	-	-	-

	Unrestricted Potential Emissions (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
NG Combustion	0.01	0.05	0.05	4.2E-03	0.70	0.04	0.59	-	0.01
Parts Washer	-	-	-	-	-	0.48	-	-	-
Total PTE of Entire Source Excluding Fugitive Emissions*	1.23	1.28	1.28	4.2E-03	0.70	46.73	0.59	0.26	0.27
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
Paved Roads	0.24	0.05	0.01	-	-	-	-	-	-
Total PTE of Entire Source Including Source-Wide Fugitives*	1.48	1.32	1.29	4.2E-03	0.70	46.73	0.59	0.26	0.27
MSOP Thresholds	25	25	25	25	25	25	< 100	< 10	< 25

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
³Single highest source-wide HAP. (diethanolamine)
 *Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated air pollutants is less than 100 tons per year. However, VOC is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.

Potential to Emit After Issuance

The table below summarizes the potential to emit of the entire source, reflecting the limited potential to emit after PSD Minor limitation(s) for PM. The potential to emit of all other pollutants are uncontrolled/unlimited. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) (Uncontrolled)								
	PM¹	PM₁₀¹	PM_{2.5}^{1,2}	SO₂	NO_x	VOC	CO	Single HAP³	Total HAPs
Lithographic Press MR-1	0.13	0.13	0.13	-	-	3.45	-	0.02	0.02
Lithographic Press MR-2	0.23	0.23	0.23	-	-	22.61	-	0.13	0.13
Lithographic Press MR-3	0.39	0.39	0.39	-	-	12.68	-	0.07	0.07
Lithographic Press MR-4	0.46	0.46	0.46	-	-	7.40	-	0.04	0.04
VUTEck Printer	-	-	-	-	-	0.08	-	-	-
NG Combustion	0.01	0.05	0.05	4.2E-03	0.70	0.04	0.59	-	0.01
Parts Washer	-	-	-	-	-	0.48	-	-	-
Total PTE of Entire Source Excluding Fugitive Emissions*	1.23	1.28	1.28	4.2E-03	0.70	46.73	0.59	0.26	0.27
Title V Major Source Thresholds	--	100	100	100	100	100	100	10	25
Fugitives									
Paved Roads	0.24	0.05	0.01	-	-	-	-	-	-
Total PTE of Entire Source Including Source-Wide Fugitives*	1.48	1.32	1.29	4.2E-03	0.70	46.73	0.59	0.26	0.27
MSOP Thresholds	25	25	25	25	25	25	< 100	< 10	< 25
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP (diethanolamine) *Fugitive HAP emissions are always included in the source-wide emissions.									

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ and 326 IAC 12, are not included in the permit for this source, because lithographic printing presses are not rotogravure printing presses.
- (b) The requirements of the New Source Performance Standard for Flexible Vinyl and Urethane Coating and Printing, 40 CFR 60, Subpart FFF and 326 IAC 12, are not included in the permit for this source, because the source uses lithographic printing presses rather than rotogravure presses.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Potential to Emit After Issuance section of this document.

326 IAC 2-2 (PSD)

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70), it is not located in Lake or Porter County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2).

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

The source is subject to the requirements of 326 IAC 6-4, because the paved roads have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This source (located in Marion County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide unlimited PTE of PM is less of than 10 tons per year; therefore, the source-wide actual emissions of PM are less than 10 tons per year. This source is not subject to the requirements of 326 IAC 6.5 because the source-wide PTE of PM is less than 100 tons per year and source-wide actual emissions of PM are less than 10 tons per year.

State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

Lithographic Presses

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though these facilities were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because the unlimited VOC potential emissions for each individual press are less than twenty-five (25) tons per year.

326 IAC 8-2-5 (Paper Coating Operations)

The lithographic presses are not subject to the requirements of 326 IAC 8-2-5, since the printing press is lithographic and this rule applies only to web coating and saturation processes of paper, plastic, and pressure sensitive tapes and labels.

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

The lithographic presses are not subject to the requirements of 326 IAC 8-5-5, since the printing press is lithographic and this rule applies only to packaging rotogravure, publication rotogravure, and flexographic printing sources.

Rheem and Bryant Gas-Fired Furnaces

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This source (located in Marion County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide unlimited PTE of PM is less of than 10 tons per year; therefore, the source-wide actual emissions of PM are less than 10 tons per year. This source is not subject to the requirements of 326 IAC 6.5 because the source-wide PTE of PM is less than 100 tons per year and source-wide actual emissions of PM are less than 10 tons per year.

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

Indirect Heating Units Which Began Operation After September 21, 1983					
Facility	Construction Date	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
One (1) Bryant natural gas-fired furnace	2005	0.12	0.12	0.6	0.00186
One (1) Rheem natural gas-fired furnace	2010	0.12	0.24	0.6	0.00186
Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed. Note: Emission units shown in strikethrough were subsequently removed from the source. The effect of removing these units on "Q" is shown in the year the boiler was removed..					

The potential to emit particulate from each of the two (2) furnaces is 0.0019 lb/MMBtu. Therefore, the two (2) furnaces are able to comply without a control device.

Parts Washer

326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements)

Pursuant to 326 IAC 8-3-1(c)(1)(B), the requirements of 326 IAC 8-3-2(a) apply to the cold cleaning degreaser parts washer because the cold cleaning degreaser was constructed after January 1, 1980, located anywhere in the state, and has potential VOC emissions.

326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)

Pursuant to 326 IAC 8-3-1(c)(3)(A) and (B), the cold cleaning degreaser parts washer is subject to the material requirements and recordkeeping requirements of 326 IAC 8-3-8.

Compliance Determination and Monitoring Requirements

There are no compliance requirements applicable to this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 29, 2024.

The operation of this stationary lithographic printing operation shall be subject to the conditions of the attached proposed MSOP Renewal No. 097-47888-00657.

The staff recommends to the Commissioner that the MSOP Renewal be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Pratim Moulik, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-6871 or (800) 451-6027, and ask for Pratim Moulik or (317) 234-6871.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

**Appendix A: Emissions Calculations
Potential Emissions Summary**

Company Name: Litho Press, Inc.
Address City IN Zip: 1747 Massachusetts Ave, Indianapolis IN 46201
Permit Number: M097-47888-00657
Reviewer: Pratim Moulik

Uncontrolled Potential to Emit (tons/year)									
Emissions Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Highest Single HAP (Dielthanolamine)	Total HAPs
Lithographic Press MR-1	0.13	0.13	0.13	-	-	3.45	-	0.02	0.02
Lithographic Press MR-2	0.23	0.23	0.23	-	-	22.61	-	0.13	0.13
Lithographic Press MR-3	0.39	0.39	0.39	-	-	12.68	-	0.07	0.07
Lithographic Press MR-4	0.46	0.46	0.46	-	-	7.40	-	0.04	0.04
VUteck Printer	-	-	-	-	-	0.08	-	-	-
NG Combustion	0.01	0.05	0.05	4.2E-03	0.70	0.04	0.59	-	0.01
Parts Washer	-	-	-	-	-	0.48	-	-	-
Paved Roads Fugitives	0.24	0.05	0.01	-	-	-	-	-	-
Total	1.48	1.32	1.29	0.00	0.70	46.73	0.59	0.26	0.27

**Appendix A: Emissions Calculations
PM Lithographic Presses**

Company Name: Litho Press, Inc.
Address City IN Zip: 1747 Massachusetts Ave, Indianapolis IN 46201
Permit Number: M097-47888-00657
Reviewer: Pratim Moulik

Press	Material	Max Sheets per Hour	Max Print Area			Max Print Area (MMin ² /hr)	Emission Factor* (lbs/MMin ²)	Particulate Emissions	
			(in)	x	(in)			(lbs/hr)	(tons/yr)
Manitowoc Lithographic Press (MR-4)	Corn Starch	12,000	28.25	x	40.90	13.87	0.0022	0.031	0.13
Heidelberg 162 (MR-2)		11,000	39.25	x	55.90	24.13	0.0022	0.053	0.23
Manitowoc Lithographic Press (MR-2)		11,000	50.75	x	72.25	40.33	0.0022	0.089	0.39
RAPIDA 205 (MR-4)		10,000	59.44	x	80.50	47.85	0.0022	0.106	0.46
Total:								0.28	1.22

*Emission Factor calculated using data from previous air permit (097-32831-00657)

METHODOLOGY

PM Emissions (tons/year) = Max Print Area (MMin²/hr) * Emission Factor (lbs/MMin²) * 8760 (hr) / 2000 (lbs)

PM Emissions are assumed to be equal to PM10 and PM2.5 emissions.

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

Company Name: Litho Press, Inc.
Address City IN Zip: 1747 Massachusetts Ave, Indianapolis IN 46201
Permit Number: M097-47888-00657
Reviewer: Pratim Moulik

Man700 Lithographic Press (MR-1)

Press	Maximum Usage (lbs/hr)	Weight % VOC	Weight % HAPs	PTE of VOC		PTE of Total HAPs	
				(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Conventional Ink*	4.36	0.07%	0.00%	3.05E-03	1.34E-02	0.00	0.00
UV Ink*	4.36	0.20%	0.10%	8.73E-03	3.82E-02	4.36E-03	1.91E-02
Fountain Solutions	0.27	17.50%	0.00%	0.05	0.20	0.00	0.00
Solvents (press, blanket wash)	0.75	97.00%	0.00%	0.73	3.19	0.00	0.00
Totals:				0.79	3.45	4.36E-03	1.91E-02

*The lithographic press can only use one type of ink at a time, therefore the worst case ink was used to calculate PTE. The conventional ink is dried through oxidation and heat and the UV ink is cured using UV light.

Heidelberg 162 (MR-2)

Press	Maximum Usage (lbs/hr)	Weight % VOC	Weight % HAPs	PTE of VOC		PTE of Total HAPs	
				(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Conventional Ink*	28.62	0.07%	0.00%	2.00E-02	8.77E-02	0.00	0.00
UV Ink*	28.62	0.20%	0.10%	5.72E-02	0.25	2.86E-02	1.25E-01
Fountain Solutions	1.75	17.50%	0.00%	3.07E-01	1.34	0.00	0.00
Solvents (press, blanket wash)	4.93	97.00%	0.00%	4.78	20.93	0.00	0.00
Total:				5.16	22.61	2.86E-02	1.25E-01

*The lithographic press can only use one type of ink at a time, therefore the worst case ink was used to calculate PTE. The conventional ink is dried through oxidation and heat and the UV ink is cured using UV light.

Man900 Lithographic Press (MR-3)

Press	Maximum Usage (lbs/hr)	Weight % VOC	Weight % HAPs	PTE of VOC		PTE of Total HAPs	
				(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Conventional Ink*	16.04	0.07%	0.00%	1.12E-02	4.92E-02	0.00	0.00
UV Ink*	16.04	0.20%	0.10%	3.21E-02	0.14	1.60E-02	7.03E-02
Fountain Solutions	0.98	17.50%	0.00%	0.17	0.75	0.00	0.00
Solvents (press, blanket wash)	2.76	97.00%	0.00%	2.68	11.73	0.00	0.00
Total:				2.89	12.68	1.60E-02	7.03E-02

*The lithographic press can only use one type of ink at a time, therefore the worst case ink was used to calculate PTE. The conventional ink is dried through oxidation and heat and the UV ink is cured using UV light.

RAPIDA 205 (MR-4)

Press	Maximum Usage (lbs/hr)	Weight % VOC	Weight % HAPs	PTE of VOC		PTE of Total HAPs	
				(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Conventional Ink*	9.37	0.07%	0.00%	6.56E-03	2.87E-02	0.00	0.00
UV Ink*	9.37	0.20%	0.10%	1.87E-02	8.21E-02	9.37E-03	4.10E-02
Fountain Solutions	0.57	17.50%	0.00%	1.00E-01	4.40E-01	0.00	0.00
Solvents (press, blanket wash)	1.61	97.00%	0.00%	1.56	6.85	0.00	0.00
Total:				1.69	7.40	9.37E-03	4.10E-02

*The lithographic press can only use one type of ink at a time, therefore the worst case ink was used to calculate PTE. The conventional ink is dried through oxidation and heat and the UV ink is cured using UV light.

(Source -USEPA Control Techniques Guideline for Offset Lithographic Printing, 2006, Page 19)

There is only one single HAP, and that is diethanolamine

Appendix A: Emissions Calculations
One (1) Bryant Furnace, One (1) Rheem Furnace, and Seven (7) Radiant Heaters
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Litho Press, Inc.
Address City IN Zip: 1747 Massachusetts Ave, Indianapolis IN 46201
Permit Number: M097-47888-00657
Reviewer: Pratim Moulik

Heat Input Capacity MMBtu/hr	HHV mmBtu	Potential Throughput MMCF/yr
1.64	1020	14.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.01	0.05	0.05	4.2E-03	0.70	0.04	0.59

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.5E-05	8.5E-06	5.3E-04	1.3E-02	2.4E-05	1.3E-02

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	3.5E-06	7.7E-06	9.9E-06	2.7E-06	1.5E-05	3.9E-05

Methodology is the same as above.

Total HAPs	1.33E-02
Worst HAP (Hexane)	1.27E-02

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
EFI Inkjet Printer Emissions**

Company Name: Litho Press, Inc.
Address City IN Zip: 1747 Massachusetts Ave, Indianapolis IN 46201
Permit Number: M097-47888-00657
Reviewer: Pratim Moulik

Uncontrolled Emissions from Inkjet Printer					
	Max Throughput (MMin2/hr)	Application Rate (lbs/MMin2)	Material Usage (lbs/hr)	Max VOC Content (Weight %)	VOC Emissions (tons/yr)
Ink	0.102	7.5	0.765	0.02%	6.7E-04
UV Flush	0.102	0.18	1.84E-02	96.50%	7.76E-02
Total:					0.08

Methodology:

There are no AP-42 emissions factors for this printer.

There are no HAPs for the ink or the flush solution associated with this EFI Inkjet Printer noted in the MSDS.

Appendix A: Emissions Calculations
VOC Emissions from
Parts Washer

Company Name: Litho Press, Inc.
Address City IN Zip: 1747 Massachusetts Ave, Indianapolis IN 46201
Permit Number: M097-47888-00657
Reviewer: Pratim Moulik

Emission Unit	Usage (gal/yr)	Solvent Density (lbs/gal)	VOC Content (%)	PTE of VOC (tons/yr)
Safety-Kleen Premium Solvent	145	6.60	100.00%	0.48

METHODOLOGY:

PTE of VOC (tons/yr) = Usage (gal/yr) * Solvent Density (lbs/gal) * VOC Content (%) / 2000 (lbs/ton)

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: Litho Press, Inc.
Address City IN Zip: 1747 Massachusetts Ave, Indianapolis IN 46201
Permit Number: M097-47888-00657
Reviewer: Pratim Moulik

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	2.0	2.0	8.0	16.0	2640	0.500	1.0	365.0
Vehicle (leaving plant) (one-way trip)	1.0	2.0	2.0	8.0	16.0	2640	0.500	1.0	365.0
Totals			4.0		32.0			2.0	730.0

Average Vehicle Weight Per Trip =

8.0	tons/trip
-----	-----------

Average Miles Per Trip =

0.50	miles/trip
------	------------

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	8.0	8.0	8.0	tons = average vehicle weight
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$
where p =

125	days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
-----	---

N =

365	days per year
-----	---------------

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.725	0.145	0.0356	lb/mile
Mitigated Emission Factor, Eext =	0.663	0.133	0.0326	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)	Mitigated PTE of PM (After Control) (tons/yr)	Mitigated PTE of PM10 (After Control) (tons/yr)	Mitigated PTE of PM2.5 (After Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	0.12	0.02	0.01	0.06	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.12	0.02	0.01	0.06	0.01	0.00
Totals	0.24	0.05	0.01	0.12	0.02	0.01

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (Before Control) (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (After Control) (tons/yr) = [Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 27, 2024

Justin Hiott
Litho Press, Inc.
1747 Massachusetts Ave
Indianapolis, IN 46201

Re: Public Notice
Litho Press, Inc.
Permit Level: MSOP Renewal
Permit Number: 097-47888-00657

Dear Mr. Hiott:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, **are available electronically at:**

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option by **Permit Number**, then enter permit 47888

and

IDEM's Virtual File Cabinet (VFC): <https://www.IN.gov/idem>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: <https://www.in.gov/idem/public-notices/>

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Indianapolis Public Library - Central Library, 40 E Saint Clair St in Indianapolis, IN 46204. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Pratim Moulik, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 6871 or dial (317) 234-6871.

Sincerely,

Tara Champion

Tara Champion
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover Letter access via website 8/10/2020



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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 27, 2024

To: Indianapolis Public Library - Central Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Litho Press, Inc.
Permit Number: 097-47888-00657

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019



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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

Notice of Public Comment

June 27, 2024
Litho Press, Inc.
097-47888-00657

To: Interested Parties:

You are receiving this notice because you asked to be on IDEM's notification list for this company and/or county; or because your property is nearby the company being permitted; or because you represent a local/regional government entity. The Indiana Department of Environmental Management, Office of Air Quality, invites your comments on the draft air permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM's Public Notice website at <https://www.in.gov/idem/public-notices/>.


The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN Interested Parties Cover Letter 10/13/2023

Mail Code 61-53

IDEM Staff	TCHAMPIO 6/27/2024 Litho Press Incorporated 097-47888-00657 draft		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Justin Hiott Litho Press Incorporated 1747 Massachusetts Ave Indianapolis IN 46201 (Source CAATS)									
2		Indianapolis Public Library - Central Library 40 E Saint Clair St Indianapolis IN 46204 (Library)									
3		Indianapolis City Council and Mayors office 200 E Washington St, City-County Bldg, Ste 2501 Indianapolis IN 46204 (Local Official)									
4		Marion County Commissioners 200 E Washington St, City-County Bldg, Ste 801 Indianapolis IN 46204 (Local Official)									
5		Office of Sustainability, Marion County City-County Bldg, 200 E Washington St, Rm 2460 Indianapolis IN 46204 (Local Official)									
6		Planning Div., Dept. of Metropolitan Development 200 E Washington St Rm 2042 Indianapolis IN 46204 (Local Official)									
7		Marion County Health Department 3838 N Rural St Indianapolis IN 46205 (Health Department)									
8		Wayne Township Trustee 5401 W Washington St Indianapolis IN 46241 (Local Official)									
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