From:	Moulik, Pratim
То:	chosier@decaenvironmental.com
Subject:	IDEM OAQ Contact Information for Application No. 097-47888-00657 for Litho Press, Inc.
Date:	Wednesday, May 29, 2024 1:24:00 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png image005.png image007.png image007.png image009.png

Dear Chris Hosier,

I am the permit writer assigned to the current application No. 097-47888-00657 for Litho Press, Inc.. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

To expedite the review process, please e-mail me the electronic copy of your calculations (preferably in excel format) and other supporting documents used as part of your application.

Based on my preliminary review of the application, please send the email information of the source contact Justin Hiott.

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If Litho Press, Inc. would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

Based on my preliminary review of the application, the permit approval that is required for this application will be subject to the public notice requirements of 326 IAC 2-1.1-6. As the permit applicant, you are required to place a copy of the permit application packet for public review at a public library in the county where the source is located (preferably at the local public library nearest to the source in the county where the source is located) within ten (10) days of the submission of the application. In the GSD-01 Form, Part H, the date that the application packet was filed with the local library was not provided. Please provide the date that the application packet was filed with the local library and confirm whether (or not) a copy of the

application packet was placed at the local library.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Josiah Balogun) may be contacted at 317-234-1203 or jbalogun@idem.IN.gov.

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Pratim Moulik



Pratim Moulik Environmental Manager 2

(317) 234-6871 • <u>PMoulik@idem.IN.gov</u>

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From:	Chris Hosier
То:	Moulik, Pratim
Subject:	RE: IDEM OAQ Contact Information for Application No. 097-47888-00657 for Litho Press, Inc.
Date:	Thursday, May 30, 2024 10:25:04 AM
Attachments:	image001.png
	image002.png
	image011.png
	image012.png
	image013.png
	image014.png
	image015.png
	image016.png
	image003.png
	Litho Press - 2019 Calculations.xlsx

## \*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

Thanks Pratim, seems like I am keeping you busy !

## **Chris Hosier**

Project Manager | <u>DECA Environmental & Associates, Inc.</u> Office: (317) 575-0095 | Cell: (765)-437-1066

From: Moulik, Pratim <PMoulik@idem.IN.gov>
Sent: Wednesday, May 29, 2024 1:24 PM
To: Chris Hosier <chosier@decaenvironmental.com>
Subject: IDEM OAQ Contact Information for Application No. 097-47888-00657 for Litho Press, Inc.

Dear Chris Hosier,

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To expedite the review process, please e-mail me the electronic copy of your calculations (preferably in excel format) and other supporting documents used as part of your application.

Based on my preliminary review of the application, please send the email information of the source contact Justin Hiott.

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If Litho Press, Inc. would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

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Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Pratim Moulik



Pratim Moulik Environmental Manager 2 (317) 234-6871 • <u>PMoulik@idem.IN.gov</u>



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## Appendix A: Emissions Calculations Summary Table

Company Name: Litho Press, Inc. Address City IN Zip: 1747 Massachusetts Avenue, Indianapolis IN 46201 Permit Number: Reviewer:

Uncontrolled Potential to Emit (tons/yr)										
Emission Unit	PM	PM10	PM2.5*	SO <sub>2</sub>	NOx	VOC	со	<b>Total HAPs</b>	Single Hig	ghest HAP
Lithograhic Press MR-1	0.13	-	-	-	-	3.45	-	0.02	-	-
Lithograhic Press MR-2	0.23	-	-	-	-	22.61	-	0.13	-	-
Lithograhic Press MR-3	0.39	-	-	-	-	12.68	-	0.07	-	-
Lithograhic Press MR-4	0.46	-	-	-	-	7.40	-	0.04	-	-
Inkjet Printer	-	-	-	-	-	0.08	-	0.00	-	-
Natural Gas Combustion	0.01	0.05	0.05	0.00	0.70	0.04	0.59	0.01	0.01	Hexane
Part Cleaner	-	-	-	-	-	0.48	-	-	-	-
Total	1.23	0.05	0.05	0.00	0.70	46.73	0.59	0.27	0.01	0.00

## Appendix A: Emissions Calculations PM Potential to Emit

Company Name: Litho Press, Inc. Address City IN Zip: 1747 Massachusetts Avenue, Indianapolis IN 46201 Permit Number: Reviewer: Date:

Press	Material	Max Sheets per Hour	Max Print Area			Max Print Area	Emission Factor*	Particulate	Emissions
		noui	(in)	х	(in)	(MMin <sup>2</sup> /hr)	(lbs/MMin <sup>2</sup> )	(lbs/hr)	(tons/yr)
Man700 Lithographic Press (MR-1)	Corn Starch	12,000	28.25	x	40.90	13.87	0.0022	0.031	0.13
Heidelberg 162 (MR-2) - replacement lithographic press unit		11,000	39.25	х	55.90	24.13	0.0022	0.053	0.23
Man900 Lithographic Press (MR-3)		11,000	50.75	x	72.25	40.33	0.0022	0.089	0.39
RAPIDA 205 (MR-4) - new lithographic press unit		10,000	59.44	x	80.50	47.85	0.0022	0.106	0.46
<u> </u>							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. Permit Number: **Reviewer:**

Address City IN Zip: 1747 Massachusetts Avenue, Indianapolis IN 46201

### Man700 Lithographic Press (MR-1)

Press	Maximum Usage	Weight % VOC	Weight % HAPs	PTE of VOC		PTE of Total HAPs	
	(lbs/hr)			(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Conventional Ink*	4.36	0.07%	0.00%	3.05E-03	0.01	0.00	0.00
UV Ink*	4.36	0.20%	0.10%	8.73E-03	0.04	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	0.00	0.02

\*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) - replacement lithographic press unit

Press	Maximum Usage VOC		Weight % HAPs	PTE of VOC		PTE of Total HAPs	
	(lbs/hr)	VUC	TAPS	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Conventional Ink*	28.62	0.07%	0.00%	0.02	0.09	0.00	0.00
UV Ink*	28.62	0.20%	0.10%	0.06	0.25	0.03	0.13
Fountain Solutions	1.75	17.50%	0.00%	0.31	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	0.03	0.13

\*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	Weight % VOC	Weight % HAPs	PTE of VOC		PTE of Total HAPs	
	(lbs/hr)			(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Conventional Ink*	16.04	0.07%	0.00%	0.01	0.05	0.00	0.00
UV Ink*	16.04	0.20%	0.10%	0.03	0.14	0.02	0.07
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	0.02	0.07

\*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) - new lithographic press unit

Press	Maximum Usage	Weight % VOC	Weight % HAPs -	PTE of VOC		PTE of Total HAPs	
	(lbs/hr)	VUC		(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Conventional Ink*	9.37	0.07%	0.00%	6.56E-03	0.03	0.00	0.00
UV Ink*	9.37	0.20%	0.10%	0.02	0.08	9.37E-03	0.04
Fountain Solutions	0.57	17.50%	0.00%	0.10	0.44	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	0.01	0.04

\*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.

## Appendix A: Emissions Calculations VOC Content of EFI Inkjet Printer

Company Name:Litho Press, Inc.Address City IN Zip:1747 Massachusetts Avenue, Indianapolis IN 46201Permit Number:097-32831-00657Reviewer:Company Name

Potential to Emit VOC from Inkjet Printer

Ink	Weight % VOC	Weight % HAP	Maximum Throughput* (MMin2/hr)	Application Rate* (Ibs/MMin2)	Material Usage (Ibs/hr)	PTE of VOC (tons/yr)	PTE of HAPs (tons/yr)
VUTEk LX3 PRO INK	0.02%	0.00%	0.102	7.50	0.77	6.71E-04	0.00
UV Flush	96.50%	0.00%	0.102	0.18	0.02	0.078	0.00
					Total:	0.078	0.00

\*Values from previous air permit for Litho Press issued on April 10, 2013 (097-32831-00657)

METHODOLOGY:

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

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

#### Appendix A: Emissions Calculations Natural Gas Combustion Only MM BTU/HR <100

Permit Number: Reviewer:

Company Name: Litho Press, Inc. Address City IN Zip: 1747 Massachusetts Avenue, Indianapolis IN 46201

Heat Input Capacity	,	HHV mmBtu	Potential Throughput
MMBtu/hr		mmscf	MMCF/yr
1.4	Seven (7) radient space heaters @ 0.2 MMBtu/hr		
0.12	One (1) Rheem furnace @ 0.12 MMBtu/hr		
0.12	One (1) Bryant furnace @ 0.12 MMBtu/hr		
1.6		1020	14.1

		Pollutant								
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO			
Emission Factor in Ib/MMCF	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	0.00	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

#### Hazardous Air Pollutants (HAPs)

		HAPs - Organics								
	Benzene	Benzene Dichlorobenzene Formaldehyde Hexane Toluene								
Emission Factor in Ib/MMcf	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	0.01	2.4E-05	0.01				

		HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in Ib/MMcf	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 0.01			0.01			
The five highest organic and metal HAPs emission factors are provided above.			Worst HAP	0.01		

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

## Appendix A: Emissions Calculations VOC Emissions from Parts Washer

Company Name: Litho Press, Inc. Address City IN Zip: 1747 Massachusetts Avenue, Indianapolis IN 4620 Permit Number: Reviewer:

Potential to emit from Parts Washer (PW-1)

Emission Unit	Usage (gal/yr)	Solvent Density (Ibs/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)

01

From:	Moulik, Pratim		
То:	chosier@decaenvironmental.com		
Subject:	IDEM OAQ No. Application 097-47888-00657 for Litho Press, Inc.		
Date:	Tuesday, June 4, 2024 12:33:00 PM		
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png image008.png image008.png image009.png		

Dear Chris,

Regarding the calculations, I did not see any fugitive emissions. I took a look on Google Maps and saw the source has a parking lot and a truck that is parked labelled "Litho Press", which implies that there are fugitive emissions. I was just wondering if you have fugitive emission calcs for the source or do you think you can talk to the source contact to see if there are any?

With Regards, Pratim Moulik



Pratim Moulik Environmental Manager 2 (317) 234-6871 • <u>PMoulik@idem.IN.gov</u>

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Scan the QR code to leave your feedback.



From:	Moulik, Pratim
То:	Chris Hosier
Subject:	RE: IDEM OAQ No. Application 097-47888-00657 for Litho Press, Inc.
Date:	Wednesday, June 5, 2024 3:21:00 PM
Attachments:	image001.png
	image002.png
	image005.png
	image006.png
	image007.png
	image008.png
	image009.png
	image010.png
	image004.png

Ok. Thanks. That will cover the whole fugitive emissions.



We appreciate your input!



From: Chris Hosier <chosier@decaenvironmental.com>
Sent: Wednesday, June 5, 2024 3:20 PM
To: Moulik, Pratim <PMoulik@idem.IN.gov>
Subject: RE: IDEM OAQ No. Application 097-47888-00657 for Litho Press, Inc.

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Source said the truck weighs Approx 12 - 16K lbs

Thanks Chris

## **Chris Hosier**

Project Manager | <u>DECA Environmental & Associates, Inc.</u> Office: (317) 575-0095 | Cell: (765)-437-1066

From: Moulik, Pratim <<u>PMoulik@idem.IN.gov</u>>
Sent: Wednesday, June 5, 2024 3:02 PM

To: Chris Hosier <<u>chosier@decaenvironmental.com</u>> Subject: RE: IDEM OAQ No. Application 097-47888-00657 for Litho Press, Inc.

Hi Chris,

Thanks for the response. Could you also ask Litho Press what the truck weight is? I think there might have been a typo with you mentioning transporting "mirrors".

With Regards, Pratim Moulik



Pratim Moulik Environmental Manager 2

(317) 234-6871 • <u>PMoulik@idem.IN.gov</u>

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Scan the QR code to leave your feedback.

We appreciate your input!



From: Chris Hosier <<u>chosier@decaenvironmental.com</u>>
Sent: Wednesday, June 5, 2024 2:55 PM
To: Moulik, Pratim <<u>PMoulik@idem.IN.gov</u>>
Subject: RE: IDEM OAQ No. Application 097-47888-00657 for Litho Press, Inc.

# \*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

Source explained to me they use that truck for 2 trips a day, to move mirrors 0.5 mi there and back.

So technically yes there is fugitive emissions from that truck on paved roads only, but they do not have any calcs in their permit as they just transitioned to their MSOP a few years ago.

Thanks Chris

## **Chris Hosier**

Project Manager | <u>DECA Environmental & Associates, Inc.</u> Office: (317) 575-0095 | Cell: (765)-437-1066 From: Moulik, Pratim <<u>PMoulik@idem.IN.gov</u>>
Sent: Tuesday, June 4, 2024 12:34 PM
To: Chris Hosier <<u>chosier@decaenvironmental.com</u>>
Subject: IDEM OAQ No. Application 097-47888-00657 for Litho Press, Inc.

Dear Chris,

Regarding the calculations, I did not see any fugitive emissions. I took a look on Google Maps and saw the source has a parking lot and a truck that is parked labelled "Litho Press", which implies that there are fugitive emissions. I was just wondering if you have fugitive emission calcs for the source or do you think you can talk to the source contact to see if there are any?

With Regards, Pratim Moulik



Pratim Moulik Environmental Manager 2

(317) 234-6871 • <u>PMoulik@idem.IN.gov</u>



Scan the QR code to leave your feedback.



From:	Moulik, Pratim
То:	chosier@decaenvironmental.com
Subject:	Applicant Review for MSOP Renewal No. 097-47888-00657 for Litho Press, Inc.
Date:	Monday, June 17, 2024 2:18:00 PM
Attachments:	47888AR.zip
	image001.png
	image002.png
	image003.png
	image004.png
	image005.png
	image006.png
	image007.png
	image008.png
	image009.png
Importance:	High

#### Dear Chris Hosier:

Attached is the draft MSOP Renewal and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to posting the public notice on IDEM's website. This supplemental step of providing you the draft permit does not take away your legal right to provide comments during the thirty (30) day comment period.

The time clock for MSOP Renewal No.: 097-47888-00657 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to public notice the permit in a timely manner, you are being allotted two (2) weeks from today to provide comments in writing, email is sufficient. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before July 1, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for public notice.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Please send a reply email to me immediately confirming that you have received this draft version of the permit for review and that you are able to access these files in their current format.

The following documents are not included in this review but will be included during the public notice period:

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$100, which is based on the following:

\$100 MSOP Renewal
--------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely, Pratim Moulik



Environmental Manager 2

(317) 234-6871 • <u>PMoulik@idem.IN.gov</u>



Scan the QR code to leave your feedback.



From:	Chris Hosier
To:	Moulik, Pratim
Subject:	RE: Applicant Review for MSOP Renewal No. 097-47888-00657 for Litho Press, Inc.
Date:	Tuesday, June 25, 2024 9:01:13 AM
Attachments:	image001.png
	image002.png
	image011.png
	image012.png
	image013.png
	image014.png
	image015.png
	image016.png
	image003.png

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We have no comments, Thank you

### **Chris Hosier**

Project Manager | <u>DECA Environmental & Associates, Inc.</u> Office: (317) 575-0095 | Cell: (765)-437-1066

From: Moulik, Pratim <PMoulik@idem.IN.gov>
Sent: Monday, June 17, 2024 2:18 PM
To: Chris Hosier <chosier@decaenvironmental.com>
Subject: Applicant Review for MSOP Renewal No. 097-47888-00657 for Litho Press, Inc.
Importance: High

Dear Chris Hosier:

Attached is the draft MSOP Renewal and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to posting the public notice on IDEM's website. This supplemental step of providing you the draft permit does not take away your legal right to provide comments during the thirty (30) day comment period.

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\$100 MSOP Renewal	_		
		\$100	MSOP Renewal

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely, Pratim Moulik



Scan the QR code to leave your feedback.

