



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

January 6, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Courier Kendallville, Inc. / SPR 113-17840-00021

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot 9/16/03



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Courier Kendallville, Inc. 2500 Marion Drive Kendallville, Indiana 46755

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Table with 2 columns: Issued by (Paul Dubenetzky, Branch Chief, Office of Air Quality) and Issuance/Expiration Dates (October 13, 2000 / October 13, 2005). Includes Operation Permit No.: F113-12093-00021.

First Administrative Amendment: 113-16645-00021, issued on November 4, 2002

First Minor Permit Revision No.: 113-16834-00021, issued on May 12, 2003

Table with 2 columns: Issued by (Original signed by Paul Dubenetzky, Branch Chief, Office of Air Quality) and Issuance Date (January 6, 2004). Includes First Significant Permit Revision No.: 113-17840-00021 and Conditions Affected: A.2, D.1, D.2.

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Courier Kendallville, Inc.  
Kendallville, Indiana  
Permit Reviewer: NH/EVP

First Significant Permit Revision  
SPR 113-17840-00021  
Revised by: CJF/MES

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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 through A.3 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 2-8-3(b)]

The Permittee owns and operates a commercial printing plant that manufactures adhesive bound and saddlewire bound books and performs the following processes: printing, drying, binding and finishing.

Authorized individual: Sybella Wilder  
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755  
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755  
Phone Number: (219) 347-3044  
SIC Code: 2752  
Source Location Status: Noble  
County Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD or Emission Offset Rules;  
Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 2.93 MMBtu/hr, exhausting to one (1) stack, identified as 6;
- (b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.4 MMBtu/hr, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;
- (c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 2.56 MMBtu/hr, exhausting to one (1) stack, identified as 2;
- (d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers,

identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;

- (e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches;
- (f) One (1) sheetfed UV Coater with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches; and
- (g) One (1) regenerative thermal oxidizer, identified as Millenium, using natural gas as a supplementary fuel at a maximum heat input rate of 2.29 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, and Lithoman.
- (h) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to one (1) of two (2) stacks Oxy 1 or Oxy 2, rated at: 10.5 million British thermal units per hour.
- (i) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel at a maximum heat input rate of 0.81 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 2. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, and Lithoman.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of 0.15 MMBtu/hr;
  - (2) Two (2) natural gas-fired air make-up units, with a maximum heat input rate of 0.18 MMBtu/hr and 0.15 MMBtu/hr, respectively;
  - (3) One (1) natural gas-fired boiler, with a maximum heat input rate of 3.0 MMBtu/hr;
  - (4) Eleven (11) natural gas fired HVAC units, ten (10) with a rating of 0.400 million British thermal units per hour, each, and one (1) with a rating of 0.350 million British thermal units per hour.
- (b) The following VOC storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;

- (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (c) Cleaners and solvents characterized as follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;

- (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (g) Paved and unpaved roads and parking lots with public access;
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (i) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
  - (1) The cleaning solvent used on the UV coater;
  - (2) One (1) film cleaner used in the plating room;
- (j) Other activities or categories not previously identified:
  - (1) Four (4) binding operations, identified as Fox Stitcher, Norm Binder, Kolbus Binder, and Kolbus K-2, each with a maximum capacity of 560 pounds of paper waste per hour;
  - (2) Film processor used to develop black and white film; and
  - (3) Five (5) plate processors used to develop printing plates;
  - (4) One (1) casemaker, identified as Kolbus DA-36;
  - (5) One (1) tipper, identified as Hunkeler VEA; and
  - (6) Five (5) electric plate processing ovens.

#### A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

#### A.5 Prior Permit Conditions

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- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the

Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

## SECTION B GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-8-6]

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 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

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

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) 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. The submittal by the Permittee does require the certification by the "authorized individual" as

defined by 326 IAC 2-1.1-1(1).

- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, then the Permittee must furnish record directly to the U.S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, 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 its 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 Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (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 contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation, except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-

1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, 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 a reasonable deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC

2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and after submittal of the following additional information:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

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 at reasonable times upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements;
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]; and
- (f) Nothing in this permit shall be constructed to limit the Permittee's right, to the extent allowed by law, to obtain duplicate or split samples.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "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 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if failure to commence construction of the emission unit within eighteen (18) months from the date of issuance of the permit, or if during the construction of work is suspended for a continuous period of one (1) year or more.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

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

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 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 forty percent (40%) 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in

326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall 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(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 14-10-4 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) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within 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. 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 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

**C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]**

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour (this time frame is determined on a case by case basis) until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.12 Monitoring Methods [326 IAC 3]**

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

- (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
  - (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
    - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
    - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
    - (3) An automatic measurement was taken when the process was not operating; or
    - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
  - (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
  - (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
  - (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
    - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
    - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

- 
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
  - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) 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.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

##### C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location 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) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must

comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 2.93 MMBtu/hr, exhausting to one (1) stack, identified as 6;
- (b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 M850 Upper Dryer and Harris M130 M850 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;
- (h) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to one (1) of two (2) stacks Oxy 1 or Oxy 2, rated at: 10.5 million British thermal units per hour.
- (i) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel at a maximum heat input rate of 0.81 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 2. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, and Lithoman.

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

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

#### D.1.1 FESOP Limit [326 IAC 2-8-4][326 IAC 8-1-6]

- (a) VOC emissions from the printing press, identified as Mark 16, the printing press, identified as M850, the printing press, identified as Lithoman, the printing press, identified as Mark 6 (listed in Section D.2), the printing press, identified as M130 (listed in Section D.2), and the printing press, identified as Heidelberg Sheetfed Press (listed in Section D.2), shall be limited to less than 98.6 tons per tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will be demonstrated by using the following equation:

$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Where:

$E_n$	=	VOC emissions
$U_n$	=	Total usage of each material
$V_n$	=	VOC content of each material
$F$	=	Flash off factor of each material
$C_n$	=	Capture efficiency

Dn = Destruction efficiency (Oxidizer control efficiency)

One of the regenerative thermal oxidizers, either Millenium or Cleanswitch, shall be in operation at all times the printing presses identified as M130 and M850 are in operation, to meet the requirements of 326 IAC 8-1-6.

- (b) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the one (1) printing press, identified as Lithoman has been determined to be:

The use of one (1) of the regenerative thermal oxidizers, identified as Millenium or Cleanswitch, at all times the press is in operation.

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

VOC input from the one (1) printing press, identified as Mark 16 shall be limited to less than 25 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for printing press M850 and its control devices.

**Compliance Determination Requirements**

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

- (a) The Permittee shall perform VOC testing on the 2.29 MM Btu/hr thermal oxidizer, identified as Millenium, by a method approved by the Commissioner, to determine the minimum operating temperature that will achieve 95.0% overall efficiency for this oxidizer. In addition to these requirements and pursuant to 326 IAC 2-1.1-11, IDEM may require compliance testing at any time to assure compliance with all applicable requirements.
- (b) Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with Condition D.1.1(b) (BACT).

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the ink, coating, fountain solution and cleaning solvent manufacturers. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

At least one (1) regenerative thermal oxidizers, identified as Millenium or Cleanswitch, shall be in operation at all times when the printing press (M850) is in operation.

Courier Kendallville, Inc.  
Kendallville, Indiana  
Permit Reviewer: NH/EVP

First Significant Permit Revision  
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Revised by: CJF/MES

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## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **D.1.8 Volatile Organic Compound Control**

When operating the printing press M850 and the, the printing press M130 (listed in Section D.2), and the printing press Lithoman, the one (1) regenerative thermal oxidizer, identified as Millenium, and the one (1) regenerative thermal oxidizer, identified as Cleanswitch, shall maintain a minimum operating temperature of 1,600°F or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-1-6 satisfied.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.1.9 Record Keeping Requirements**

(a) The Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. The records shall contain, as a minimum, the following information:

- (1) The weight of VOC-containing material used and the weight percent VOC, including purchase orders and invoices necessary to verify the type and amount used; or
- (2) The volume of VOC-containing material used and the weight of VOC per volume of VOC-containing material used.
- (3) The weight of VOCs emitted for each compliance period, considering capture and destruction (or removal) efficiency.
- (4) Operational parameters of the VOC emission control equipment, considering capture and destruction (or removal) efficiency.
- (5) Operational parameters of the VOC emission control equipment, such as:
  - (a) Data used to establish the capture and destruction (or removal) efficiencies at the time of the initial compliance test; and
  - (b) Temperature readings.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.

- (1) The amount and VOC content of each ink, fountain solution, coating material and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to inks and fountain solutions and those used as cleanup solvents;
- (2) A monthly log of use;

- (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 2.56 MMBtu/hr, exhausting to one (1) stack, identified as 2;
- (d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;
- (e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches;
- (f) One (1) sheetfed UV Coater with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches; and
- (g) One (1) regenerative thermal oxidizer, identified as Millenium, using natural gas as a supplementary fuel at a maximum heat input rate of 2.29 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, and Lithoman.

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

### Construction Conditions

#### General Construction Conditions

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

#### Effective Date of the Permit

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

D.2.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Courier Kendallville, Inc.  
Kendallville, Indiana  
Permit Reviewer: NH/EVP

First Significant Permit Revision  
SPR 113-17840-00021  
Revised by: CJF/MES

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## Operation Conditions

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

#### D.2.4 FESOP Limit [326 IAC 2-8-4][326 IAC 8-1-6]

- (a) VOC emissions from the printing press, identified as Mark 16 (listed in Section D.1), the printing press, identified as M850 (listed in Section D.1), the printing press, identified as Lithoman (listed in Section D.1), the printing press, identified as Mark 6), the printing press, identified as M130, and the printing press, identified as Heidelberg Sheetfed Press, shall be limited to less than 98.6 tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit will be demonstrated by using the following equation:

$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Where:

$E_n$	=	VOC emissions
$U_n$	=	Total usage of each material
$V_n$	=	VOC content of each material
$F$	=	Flash off factor of each material
$C_n$	=	Capture efficiency
$D_n$	=	Destruction efficiency (Oxidizer control efficiency)

One of the regenerative thermal oxidizers, either Millenium or Cleanswitch, shall be in operation at all times the printing presses identified as M130 and M850 are in operation, to meet the requirements of 326 IAC 8-1-6.

- (b) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the one (1) printing press, identified as Lithoman has been determined to be:

The use of one (1) of the regenerative thermal oxidizers, identified as Millenium or Cleanswitch, at all times the press is in operation.

#### D.2.5 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from press Mark 6 or the Heidelberg Sheetfed Press to twenty-five (25) tons per year or more, respectively, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.

#### D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for printing press M130 and its control devices.

## Compliance Determination Requirements

#### D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee shall perform VOC testing on the 2.29 MM Btu/hr thermal oxidizer, identified as Millenium, by a method approved by the Commissioner, to determine the minimum operating temperature that will achieve 95.0% overall efficiency for this oxidizer. In addition to these requirements and pursuant to 326 IAC 2-1.1-11, IDEM may require compliance testing at any time to assure compliance with all applicable requirements.

#### D.2.8 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Condition D.2.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the ink, fountain solution, coating and cleaning solvent manufacturers. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.2.9 VOC Emissions

One (1) regenerative thermal oxidizer, identified as Millenium or Cleanswitch, shall be in operation at all times when the printing press (M130) is in operation.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### D.2.10 Volatile Organic Compound Control

When operating the printing press M130, printing press M850 (listed in Section D.1), and the printing press Lithoman (listed in Section D.1) the one (1) regenerative thermal oxidizer, identified as Millenium, and the one (1) regenerative thermal oxidizer, identified as Cleanswitch, shall maintain a minimum operating temperature of 1,600°F or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-1-6 satisfied.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.2.11 Record Keeping Requirements

- (a) The Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in condition D.2.4. The records shall contain, as a minimum, the following information:
- (1) The weight of VOC-containing material used and the weight percent VOC, including purchase orders and invoices necessary to verify the type and amount used; or
  - (2) The volume of VOC-containing material used and the weight of VOC per volume of VOC-containing material used.
  - (3) The weight of VOCs emitted for each compliance period, considering capture and destruction (or removal) efficiency.
  - (4) Operational parameters of the VOC emission control equipment, considering capture and destruction (or removal) efficiency.
  - (5) Operational parameters of the VOC emission control equipment, such as:
    - (a) Data used to establish the capture and destruction (or removal) efficiencies at the time of the initial compliance test; and
    - (b) Temperature readings.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken

monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.5.

- (1) The amount and VOC content of each ink, fountain solution, coating material and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A monthly log of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
- (1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of 0.15 MMBtu/hr;
  - (2) Two (2) natural gas-fired air make-up units, with a maximum heat input rate of 0.18 MMBtu/hr and 0.15 MMBtu/hr, respectively; and
  - (3) One (1) natural gas-fired boiler, with a maximum heat input rate of 3.0 MMBtu/hr.

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

### **Boilers**

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

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

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units which have 10 MMBtu/hr heat input or less and which began operation after September 21, 1983, shall in no case exceed 0.6 lb/MMBtu heat input. Therefore PM emissions from the 3 MMBtu/hr boiler shall be limited to 0.6 lb/MMBtu heat input.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Courier Kendallville, Inc.  
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755  
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755  
FESOP No.: F113-12093-00021

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

? Annual Compliance Certification Letter

? Test Result (specify) \_\_\_\_\_  
\_\_\_\_\_

? Report (specify) \_\_\_\_\_  
\_\_\_\_\_

? Notification (specify) \_\_\_\_\_  
\_\_\_\_\_

? Affidavit (specify) \_\_\_\_\_  
\_\_\_\_\_

? Other (specify) \_\_\_\_\_  
\_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
AIR COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

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

Source Name: Courier Kendallville, Inc.  
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755  
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755  
FESOP No.: F113-12093-00021

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2
? 1. This is an emergency as defined in 326 IAC 2-7-1(12) ?The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and ?The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
? 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) ?The Permittee must submit notice in writing within ten (10) calendar days

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

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

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

**Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

A certification is not required for this report.

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

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

Source Name: Courier Kendallville, Inc.  
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755  
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755  
FESOP No.: F113-12093-00021

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

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

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Courier Kendallville, Inc.  
Source Address: 2500 Marion Drive, Kendallville, IN 46755  
Mailing Address: 2500 Marion Drive, Kendallville, IN 46755  
FESOP MPR No.: 113-16834-00021  
Facility: One (1) heat set web offset lithographic printing press, identified as Mark 16  
Parameter: VOC usage  
Limit: VOC usage not to exceed 25 tons per year

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Courier Kendallville, Inc.  
 Source Address: 2500 Marion Drive, Kendallville, Indiana 46755  
 Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755  
 FESOP No.: F113-12093-00021  
 Facilities: Six (6) printing presses (Mark 16, M850, Lithoman, Mark 6, M130, Heidelberg Sheetfed Press)  
 Parameter: VOC Emissions  
 Limit: 98.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:  

$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Where:

$E_n$  = VOC emissions  
 $U_n$  = Total usage of each material  
 $V_n$  = VOC content of each material  
 $F$  = Flash off factor of each material  
 $C_n$  = Capture efficiency  
 $D_n$  = Destruction efficiency (Oxidizer control efficiency)

YEAR: \_\_\_\_\_

Month			
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

<b>Source Name:</b>	<b>Courier Kendallville, Inc.</b>
<b>Source Location:</b>	<b>2500 Marion Drive, Kendallville, Indiana 46755</b>
<b>County:</b>	<b>Noble</b>
<b>SIC Code:</b>	<b>2752</b>
<b>Operation Permit No.:</b>	<b>F 113-12093-00021</b>
<b>Operation Permit Issuance Date:</b>	<b>October 13, 2000</b>
<b>Significant Permit Revision No.:</b>	<b>SPR 113-17840-00021</b>
<b>Permit Reviewer:</b>	<b>Craig J. Friederich</b>

On October 23, 2003, the Office of Air Quality (OAQ) had a notice published in the News-Sun, Kendallville, Indiana, stating that Courier Kendallville, Inc. had applied for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) to construct and operate a heat set web offset lithographic printing press and a regenerative thermal oxidizer for VOC control. The notice also stated that OAQ proposed to issue a Significant Permit Revision to a FESOP for this operation and provided information on how the public could review the proposed Significant Permit Revision to a FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Revision to a FESOP should be issued as proposed.

On November 14, 2003, Mark O'Donoghue of Courier Kendallville, Inc. submitted comments on the proposed Significant Permit Revision to a FESOP. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

#### **Comment 1:**

The rating on the two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, should be 2.93 MMBtu/hr, each, not 5.8 MMBtu/hr, each.

#### **Response 1:**

The following changes have been made in Section A.2(a) and Section D.1:

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

- (a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of ~~5.8~~**2.93** MMBtu/hr, exhausting to one (1) stack, identified as 6;

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8-2.93 MMBtu/hr, exhausting to one (1) stack, identified as 6;

### Comment 2:

Please revise the language in Section A.2(b) and D.1 to read:

- (b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.4 MMBtu/hr, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;

### Response 2:

The requested changes have been made to Section A.2 and D.1 as follows:

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

- (b) One (1) heat set web offset lithographic printing press (consisting ~~to~~ of four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.4 MMBtu/hr, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) heat set web offset lithographic printing press (consisting ~~to~~ of four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;

### Comment 3:

The rating on the two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, should be 2.56 MMBtu/hr, each, not 4.44 MMBtu/hr, each.

**Response 3:**

The following changes have been made in Section A.2(c) and Section D.2:

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

---

- (c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of ~~4.44~~ **2.56** MMBtu/hr, exhausting to one (1) stack, identified as 2;

**SECTION D.2**

**FACILITY CONDITIONS**

**Facility Description [326 IAC 2-8-4(10)]:**

- (c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of ~~4.44~~ **2.56** MMBtu/hr, exhausting to one (1) stack, identified as 2;

**Comment 4:**

The rating on the two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, should be 4.0 MMBtu/hr, each, not 4.44 MMBtu/hr, each. This press also exhausts to one of two stacks, and this should be indicated in the equipment list.

**Response 4:**

The following changes have been made in Section A.2(d) and Section D.2:

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

---

- (d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of ~~4.44~~ **4.0** MMBtu/hr, exhausting to one (1) ~~of~~ two (2) stacks, identified as Oxy 1 or Oxy 2;

## SECTION D.2 FACILITY CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of ~~4.44~~ **4.0** MMBtu/hr, exhausting to one (1) ~~of two~~ (2) stacks, identified as Oxy 1 or Oxy 2;

### Comment 5:

The one (1) regenerative thermal oxidizer, identified as Millenium, is used to control VOC emissions from units M130, M850, and the new Lithoman press. Please add that the Lithoman press is controlled by this thermal oxidizer to Section A.2(g) and D.2.

### Response 5:

The following changes have been made in Section A.2(g) and Section D.2:

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

- (g) One (1) regenerative thermal oxidizer, identified as Millenium, using natural gas as a supplementary fuel at a maximum heat input rate of 2.29 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, ~~and M850-~~, **and Lithoman.**

## SECTION D.2 FACILITY CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (g) One (1) regenerative thermal oxidizer, identified as Millenium, using natural gas as a supplementary fuel at a maximum heat input rate of 2.29 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, ~~and M850-~~, **and Lithoman.**

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

### Comment 6:

There is a typographical error in Section A.2(h). Also please add language to indicate that the Lithoman dryer will exhaust to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2.

### Response 6:

The typographical error has been corrected and the stack information has been added to A.2 and D.1 as follows:

Courier Kendallville, Inc.  
Kendallville, Indiana  
Permit Reviewer: CJF/MES

Page 5 of 14  
SPR 113-17840-00021

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

---

- (h) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with ~~one~~ **one (1)** natural gas-fired dryer, identified as Lithoman dryer, exhausting to **one (1) of two (2)** stacks Oxy 1 or Oxy 2, rated at: 10.5 million British thermal units per hour.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-8-4(10)]:**

- (h) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to **one (1) of two (2)** stacks Oxy 1 or Oxy 2, rated at: 10.5 million British thermal units per hour.

**Comment 7:**

The four (4) binding operations identified as Fox Stitcher, Norm Binder, Kolbus Binder, and Kolbus K-2, located in Section A.3(j) use paper waste, therefore, please add the word "waste" to the equipment list. Also, there are five (5) plate processors, please make this plural in the equipment list.

**Response 7:**

The changes to Section A.3(j) have been made as requested:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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- (j) Other activities or categories not previously identified:
- (1) Four (4) binding operations, identified as Fox Stitcher, Norm Binder, Kolbus Binder, and Kolbus K-2, each with a maximum capacity of 560 pounds of paper **waste** per hour;
  - (2) Film processor used to develop black and white film; and
  - (3) Five (5) **P**late processors used to develop printing plates;

**Comment 8:**

BACT for the printing presses identified as M130 and M850 has been determined to be the use of one of the regenerative thermal oxidizers, either Millenium or Cleanswitch. Therefore, the language in Condition D.1.1 and D.2.4 should be revised to reflect this. As stated now, the condition indicates that the use of the oxidizers will render the requirements not applicable. Also, the new printing press, identified as Lithoman, can utilize either the Millenium or Cleanswitch thermal oxidizer for VOC control. Condition D.1.1(b) should be revised to allow for the use of either oxidizer at this press.

**Response 8:**

BACT for the printing presses identified as M130 and M850 has been determined to be the use of one of the regenerative thermal oxidizers, either Millenium or Cleanswitch. Therefore, the language in Conditions D.1.1(a) and D.2.4 will be revised to reflect this. Best Available Control Technology (BACT) for the one (1) printing press, identified as Lithoman has been determined to be the use of either oxidizer, identified as Millenium or Cleanswitch. Therefore, the changes requested have been made as follows:

D.1.1 FESOP Limit [326 IAC 2-8-4][326 IAC 8-1-6]

- (a) VOC emissions from the printing press, identified as Mark 16, the printing press, identified as M850, the printing press, identified as Lithoman, the printing press, identified as Mark 6 (listed in Section D.2), the printing press, identified as M130 (listed in Section D.2), and the printing press, identified as Heidelberg Sheetfed Press (listed in Section D.2), shall be limited to less than 98.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will be demonstrated by using the following equation:

$$En = Un \times Vn \times F \times \{1 - (Cn/100) \times (Dn/100)\}$$

Where:

En	=	VOC emissions
Un	=	Total usage of each material
Vn	=	VOC content of each material
F	=	Flash off factor of each material
Cn	=	Capture efficiency
Dn	=	Destruction efficiency (Oxidizer control efficiency)

One of the regenerative thermal oxidizers, either Millenium or Cleanswitch, shall be in operation at all times the printing presses identified as M130 and M850 are in operation, to ~~render meet~~ the requirements of 326 IAC 8-1-6 ~~not applicable~~.

- (b) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the one (1) printing press, identified as Lithoman has been determined to be:

The use of **one (1)** of the regenerative thermal oxidizers, identified as **Millenium or** Cleanswitch, at all times the press is in operation.

D.2.4 FESOP Limit [326 IAC 2-8-4][326 IAC 8-1-6]

- (a) VOC emissions from the printing press, identified as Mark 16 (listed in Section D.1), the printing press, identified as M850 (listed in Section D.1), the printing press, identified as Lithoman (listed in Section D.1), the printing press, identified as Mark 6), the printing press, identified as M130, and the printing press, identified as Heidelberg Sheetfed Press, shall be limited to less than 98.6 tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit will be demonstrated by using the following equation:

$$En = Un \times Vn \times F \times \{1 - (Cn/100) \times (Dn/100)\}$$

Where:

En	=	VOC emissions
----	---	---------------

Un	=	Total usage of each material
Vn	=	VOC content of each material
F	=	Flash off factor of each material
Cn	=	Capture efficiency
Dn	=	Destruction efficiency (Oxidizer control efficiency)

One of the regenerative thermal oxidizers, either Millenium or Cleanswitch, shall be in operation at all times the printing presses identified as M130 and M850 are in operation, to ~~render meet~~ the requirements of 326 IAC 8-1-6 ~~not applicable~~.

- (b) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the one (1) printing press, identified as Lithoman has been determined to be:

The use of **one (1)** of the regenerative thermal oxidizers, identified as **Millenium or Cleanswitch**, at all times the press is in operation.

**Comment 9:**

The printing press, identified as M850, can utilize either the Millenium or Cleanswitch thermal oxidizer. Condition D.1.3 should be revised to reflect this.

**Response 9:**

Condition D.1.3 has been revised as follows:

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for printing press M850 and its control devices.

**Comment 10:**

The printing press, identified as M850, can utilize either the Millenium or Cleanswitch thermal oxidizer. The use of the Cleanswitch oxidizer should be added to Condition D.1.7.

**Response 10:**

The change requested has been made as follows to Condition D.1.7:

D.1.7 VOC Emissions

~~The~~ **At least** one (1) regenerative thermal oxidizer, identified as Millenium **or Cleanswitch**, shall be in operation at all times when the printing press (M850) is in operation.

**Comment 11:**

Please revise Condition D.1.9 to read as follows:

D.1.9 Record Keeping Requirements

- (a) The Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in condition D.1.1. The records shall contain, as a minimum, the following information:

- (1) The weight or volume of VOC-containing material used, including purchase orders and invoices necessary to verify the type and amount used.
  - (2) The VOC content (weight or weight per volume) of each material used.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
- (1) The amount and VOC content of each ink, fountain solution, coating material and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to inks and fountain solutions and those used as cleanup solvents;~~ **Solvents are not added to ink or fountain solutions**

**Response 11:**

IDEM, OAQ agrees that different types of information can be used to demonstrate compliance with Condition D.1.1. Therefore, Condition D.1.9(a) has been changed as follows:

D.1.9 Record Keeping Requirements

- (a) The Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in ~~Condition~~ **Condition** D.1.1. The records shall contain, as a minimum, the following information:
- (1) The weight of VOC-containing material used **and the weight percent VOC**, including purchase orders and invoices necessary to verify the type and amount used; ~~or:~~
  - (2) ~~The VOC content (weight and volume percent) of each material used.~~ **The volume of VOC-containing material used and the weight of VOC per volume of VOC-containing material used.**

In addition, since there are no solvents added to the ink or fountain solution, the solvent usage records will not differentiate between those added to inks and fountain solutions and those used as clean up solvents. This condition will allow for the Permittee to add solvents in the future, if so desired, without needing a permit revision. Therefore, there are no changes to Condition D.1.9(b)(1) as a result of this comment.

**Comment 12:**

The printing press, identified as M130, can utilize either the Millenium or Cleanswitch thermal oxidizer. Condition D.2.6 should be revised to reflect this.

**Response 12:**

Condition D.2.6 has been revised as follows:

D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for printing press M130 and its control devices.

**Comment 13:**

The printing press, identified as M130, can utilize either the Millenium or Cleanswitch thermal oxidizer. The use of the Cleanswitch oxidizer should be added to Condition D.2.9.

**Response 13:**

The change requested has been made as follows to Condition D.2.9:

D.2.9 VOC Emissions

~~The o~~One (1) regenerative thermal oxidizer, identified as Millenium **or Cleanswitch**, shall be in operation at all times when the printing press (M130) is in operation.

**Comment 14:**

Please add language to indicate that the thermal oxidizer, identified as Millenium, and the one (1) regenerative thermal oxidizer, identified as Cleanswitch, shall maintain a minimum operating temperature of 1,600°F or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency.

**Response 14:**

The following language has been added as suggested:

D.2.10 Volatile Organic Compound Control

When operating the printing press M130, printing press M850 (listed in Section D.1), and the printing press Lithoman (listed in Section D.1) the one (1) regenerative thermal oxidizer, **identified as Millenium, and the one (1) regenerative thermal oxidizer, identified as Cleanswitch**, shall maintain a minimum operating temperature of 1,600°F or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-1-6 satisfied.

**Comment 15:**

Please revise Condition D.2.11 to read as follows:

D.2.11 Record Keeping Requirements

- (a) The Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in condition D.2.4. The records shall contain, as a minimum, the following information:
- (1) The weight or volume of VOC-containing material used, including purchase orders and invoices necessary to verify the type and amount used.
  - (2) The VOC content (weight or weight per volume) of each material used.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records in accordance with (1) through (65) below. Records maintained for (1) through (65) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage

limits and/or the VOC emission limits established in Condition D.2.5.

- (1) The amount and VOC content of each ink, fountain solution, coating material and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
  - (2) A monthly log of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### Response 15:

IDEM, OAQ agrees that different types of information can be used to demonstrate compliance with Condition D.2.4. Therefore, Condition D.2.11(a) has been changed as follows:

#### D.2.11 Record Keeping Requirements

- (a) The Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in ~~C~~condition D.2.4. The records shall contain, as a minimum, the following information:
- (1) The weight of VOC-containing material used **and the weight percent VOC**, including purchase orders and invoices necessary to verify the type and amount used; ~~or:~~
  - (2) ~~The VOC content (weight and volume percent) of each material used.~~ **The volume of VOC-containing material used and the weight of VOC per volume of VOC-containing material used.**

In addition, since there are no solvents added to the ink or fountain solution, the solvent usage records will not differentiate between those added to inks and fountain solutions and those used as clean up solvents. This condition will allow for the Permittee to add solvents in the future, if so desired, without needing a permit revision. Therefore, there are no changes to Condition 2.11(b) as a result of this comment.

#### Comment 16:

Please make the following changes to the Technical Support Document:

#### Federal Rule Applicability

- (c) **The one (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), of 40 CFR 63,**

**Subpart JJJJ because lithographic printing is specifically excluded at 40 CFR 63.3300 (c).** ~~The potential to emit of a single Hazardous Air Pollutant (HAP) is limited to less than ten (10) tons per year and the potential to emit of combined Hazardous Air Pollutants (HAPs) is limited to less than twenty-five (25) tons per year from the entire source. Therefore, this source is a minor source of Hazardous Air Pollutants (HAPs) and the requirements of 40 CFR 63, Subpart JJJJ are not applicable to the one (1) heat set web offset lithographic printing press (consisting to four (4) printing units), identified as Lithoman.~~

### State Rule Applicability - Individual Facilities

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

The one (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, is subject to the requirements of 326 IAC 8-1-6 because the VOC emissions from this press is greater than twenty-five (25) tons per year. The **use of a regenerative** thermal oxidizer has been accepted as BACT for the press, and shall be in operation at all times the one (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, is in operation.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The one (1) regenerative thermal oxidizer, identified as Cleanswitch has applicable compliance monitoring conditions as specified below:

The Permittee shall record the combustion chamber temperature of the **regenerative thermal oxidizers, identified as Cleanswitch or Millenium** ~~one (1) regenerative thermal oxidizer, identified as Cleanswitch~~ used in conjunction with the three (3) printing presses, (M130, M850, Lithoman), continuously when the heatset web offset printing presses are in operation. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the regenerative thermal oxidizer, identified as Cleanswitch, shall be maintained at a minimum temperature of 1,600°F, or a temperature established during the latest stack test, and the minimum air flow rate shall be maintained at 27,453 acfm, or an air flow rate established during the latest stack test. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is lower than the above mentioned.

These monitoring conditions are necessary because the regenerative oxidizers for the three (3) printing presses, (M130, M850, and Lithoman) must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

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

- (b) One (1) heat set web offset lithographic printing press (consisting to four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.4 MMBtu/hr, exhausting to ~~one (1)~~ **one (1) of two (2) stacks**, identified as Oxy 1 **or Oxy 2**;
- (d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as ~~Harris M850~~ **M130** Upper Dryer and ~~Harris M850~~ **M130** Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to ~~one (1)~~ **one (1) of two (2) stacks**, identified as Oxy 1 **or Oxy 2**;

**Response 16:**

IDEM, OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

All the changes to the equipment list have been made in the permit, as shown above.

## **Indiana Department of Environmental Management Office of Air Quality**

### Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

#### **Source Background and Description**

<b>Source Name:</b>	<b>Courier Kendallville, Inc.</b>
<b>Source Location:</b>	<b>2500 Marion Drive, Kendallville, Indiana 46755</b>
<b>County:</b>	<b>Noble</b>
<b>SIC Code:</b>	<b>2752</b>
<b>Operation Permit No.:</b>	<b>F 113-12093-00021</b>
<b>Operation Permit Issuance Date:</b>	<b>October 13, 2000</b>
<b>Significant Permit Revision No.:</b>	<b>SPR 113-17840-00021</b>
<b>Permit Reviewer:</b>	<b>Craig J. Friederich</b>

The Office of Air Quality (OAQ) has reviewed a significant permit revision application from Courier Kendallville, Inc. relating to the construction and operation of the following emission units and pollution control devices:

- (a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to stacks Oxy 1 or Oxy 2, rated at: 10.5 million British thermal units per hour.
- (b) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel at a maximum heat input rate of 0.81 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 2. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, and Lithoman.

#### **History**

On August 18, 2003 Courier Kendallville, Inc. submitted an application to the OAQ requesting to add an additional heat set web offset lithographic printing press and a natural gas fired dryer to their existing plant. Courier Kendallville, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) on October 13, 2003.

#### **Enforcement Issue**

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (?F)
Oxy1 or Oxy2	M130 Dryer	32.0	2.5 or 1.94	7,598	650 or 425
Oxy1 or Oxy2	M850 Dryer	32.0	2.5 or 1.94	8,585	650 or 425
Oxy1 or Oxy2	Lithoman Dryer	32.0	2.5 or 1.94	6,804	650 or 425
Oxy 1	Millenium Oxidizer	32.0	2.5	16,755	650
Oxy2	Cleanswitch Oxidizer	32.0	1.94	29,444	425

**Recommendation**

The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

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 August 18, 2003. Additional information was received on September 11, 2003.

**Emission Calculations**

See pages 1 through 8 of 8 of Appendix A of this document for detailed emissions calculations

**Potential To Emit of Revision**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls for this revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.130
PM <sub>10</sub>	0.522
SO <sub>2</sub>	0.041
VOC	461
CO	5.76

NO <sub>x</sub>	6.87
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HAPs	Potential To Emit (tons/year)
single HAP	less than 10
combined HAPs	less than 25

**Justification for Revision**

The FESOP is being revised through a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1 (f)(1) because the potential to emit VOC from this revision is greater than twenty-five (25) tons per year.

**County Attainment Status**

The source is located in Noble County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

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

**Source Status**

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	0.39
PM <sub>10</sub>	1.56
SO <sub>2</sub>	0.12
VOC	84.77
CO	17.25
NO <sub>x</sub>	20.54

- (a) This existing source is not a major stationary source because no attainment 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.
- (b) These emissions are based upon the limited potential to emit table contained in MPR 113-16834-00021.

**Potential to Emit of Revision After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this FESOP revision.

Process/facility	Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
All Printing Presses	--	--	--	*less than 98.6	--	--	single less than 10, total less than 25
Natural Gas Fired Combustion	0.484	1.94	0.15	1.40	21.4	25.5	single less than 10, total less than 25
PSD or Offset Threshold Level	250	250	250	250	250	250	--

\*Note: Pursuant to MPR 113-16834-00021 the potential to emit VOC from the Mark 16 press is limited to less than twenty-five (25) tons per year, to render the requirements of 326 IAC 8-1-6 not applicable.

This revision to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Federal Rule Applicability**

- (a) The one (1) heat set web offset lithographic printing press (consisting to four (4) printing units),

identified as Lithoman, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart QQ), because this printing press is not a publication rotogravure printing press.

- (b) The one (1) heat set web offset lithographic printing press (consisting to four (4) printing units), identified as Lithoman, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart KK because the one (1) printing press is not publication rotogravure, packaging rotogravure or wide-web flexographic printing press.
- (c) The potential to emit of a single Hazardous Air Pollutant (HAP) is limited to less than ten (10) tons per year and the potential to emit of combined Hazardous Air Pollutants (HAPs) is limited to less than twenty-five (25) tons per year from the entire source. Therefore, this source is a minor source of Hazardous Air Pollutants (HAPs) and the requirements of 40 CFR 63, Subpart JJJJ are not applicable to the one (1) heat set web offset lithographic printing press (consisting to four (4) printing units), identified as Lithoman.

#### State Rule Applicability - Individual Facilities

##### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The unrestricted potential to emit VOC from this modification is greater than two-hundred fifty (250) tons per year. The potential to emit VOC from the entire source is limited to less than one-hundred (100) tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-2.

##### 326 IAC 2-8-4 (FESOP)

VOC emissions from the printing press, identified as Mark 16, the printing press, identified as M850, the printing press, identified as Lithoman, the printing press, identified as Mark 6 (listed in Section D.2), the printing press, identified as M130 (listed in Section D.2), and the printing press, identified as Heidelberg Sheetfed Press (listed in Section D.2), shall be limited to less than 98.6 tons per year, total. Compliance with this limit will be demonstrated by using the following equation:

$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Where:

$E_n$	=	VOC emissions
$U_n$	=	Total usage of each material
$V_n$	=	VOC content of each material
$F$	=	Flash off factor of each material
$C_n$	=	Capture efficiency
$D_n$	=	Destruction efficiency (Oxidizer control efficiency)

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

The one (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, is subject to the requirements of 326 IAC 8-1-6 because the VOC emissions from this press is greater than twenty-five (25) tons per year. The thermal oxidizer has been accepted as BACT for the press, and shall be in operation at all times the one (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, is in operation.

Courier Kendallville, Inc.  
Kendallville, Indiana  
Permit Reviewer:MES

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

The one (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman is not subject to the requirements of 326 IAC 8-5-5, because the one (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman does not involve packaging rotogravure, publication rotogravure or flexographic printing.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The one (1) regenerative thermal oxidizer, identified as Cleanswitch has applicable compliance monitoring conditions as specified below:

The Permittee shall record the combustion chamber temperature of the one (1) regenerative thermal oxidizer, identified as Cleanswitch used in conjunction with the three (3) printing presses, (M130, M850, Lithoman), continuously when the heatset web offset printing presses are in operation. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the regenerative thermal oxidizer, identified as Cleanswitch, shall be maintained at a minimum temperature of 1,600°F, or a temperature established during the latest stack test, and the minimum air flow rate shall be maintained at 27,453 acfm, or an air flow rate established during the latest stack test. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is lower than the above mentioned.

These monitoring conditions are necessary because the regenerative oxidizer for the three (3) printing presses, (M130, M850, and Lithoman) must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

### Testing Requirements

Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch, utilizing methods as approved by the Commissioner. This test shall be repeated at least

once every five years from the date of the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).

### Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

Change 1: The new emission units have been added to Condition A.2 and Section D.1 as shown below. Stack Oxy 2 has been added to the equipment list in A.2(b) and A.2(d) since these presses are going to be ducted to the new thermal oxidizer, as well as being ducted to the existing oxidizer. The facility description in A.2(d), D.2(d), and D.1(b) have also been corrected.

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

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

- (b) One (1) heat set web offset lithographic printing press (consisting to four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.4 MMBtu/hr, exhausting to ~~one (1)~~ **two (2)** stacks, identified as Oxy 1 **or Oxy 2**;
- (d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as ~~Harris M850~~ **M130** Upper Dryer and Harris ~~M850~~ **M130** Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to ~~one (1)~~ **two (2)** stacks, identified as Oxy 1 **or Oxy 2**;
- (h) **One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to stacks Oxy 1 or Oxy 2, rated at: 10.5 million British thermal units per hour.**
- (i) **One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel at a maximum heat input rate of 0.81 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 2. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, and Lithoman.**

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 5.8 MMBtu/hr, exhausting to one (1) stack, identified as 6; and
- (b) One (1) heat set web offset lithographic printing press (consisting to four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris ~~M130~~ **M850** Upper Dryer and Harris ~~M130~~ **M850** Lower Dryer, each with a maximum heat input rate of 4.0 MMBtu/hr, exhausting to ~~one (1)~~ **two (2)** stacks, identified as Oxy 1 **or Oxy 2**;
- (h) **One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to stacks Oxy 1 or Oxy 2, rated at: 10.5 million British thermal units per hour.**
- (i) **One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel at a maximum heat input rate of 0.81 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 2. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, and Lithoman.**

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

Change 2: The source has requested a VOC limit on all of the printing presses of less than 98.6 tons per year, to ensure compliance with the requirements of 326 IAC 2-8-4 (FESOP). Therefore, Condition D.1.1 has been replaced with a new Condition D.1.1 as follows:

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

#### ~~D.1.1 FESOP Limit [326 IAC 2-8-4][326 IAC 8-1-6]~~

~~VOC emissions from the printing press M850 and printing press M130 (listed in Section D.2) shall be controlled by the regenerative thermal oxidizer, identified as Millenium, that maintains a minimum overall control efficiency of 95.0%. This limit will render the requirements of 326 IAC 2-7 not applicable.~~

#### D.1.1 FESOP Limit [326 IAC 2-8-4][326 IAC 8-1-6]

- (a) VOC emissions from the printing press, identified as Mark 16, the printing press, identified as M850, the printing press, identified as Lithoman, the printing press, identified as Mark 6 (listed in Section D.2), the printing press, identified as M130 (listed in Section D.2), and the printing press, identified as Heidelberg Sheetfed Press (listed in Section D.2), shall be limited to less than 98.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will be demonstrated by using the following equation:

$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Where:

<b>E<sub>n</sub></b>	=	<b>VOC emissions</b>
<b>U<sub>n</sub></b>	=	<b>Total usage of each material</b>
<b>V<sub>n</sub></b>	=	<b>VOC content of each material</b>
<b>F</b>	=	<b>Flash off factor of each material</b>
<b>C<sub>n</sub></b>	=	<b>Capture efficiency</b>
<b>D<sub>n</sub></b>	=	<b>Destruction efficiency (Oxidizer control efficiency)</b>

One of the regenerative thermal oxidizers, either Millenium or Cleanswitch, shall be in operation at all times the printing presses identified as M130 and M850 are in operation, to render the requirements of 326 IAC 8-1-6 not applicable.

- (b) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the one (1) printing press, identified as Lithoman has been determined to be:

The use of the regenerative thermal oxidizer, identified as Cleanswitch, at all times the press is in operation.

Change 3: Testing is required on the new thermal oxidizer, identified as Cleanswitch, and the new thermal oxidizer shall be in operation at all times, to comply with the requirements of 326 IAC 8-1-6 (BACT). These requirements have been added as D.1.4(b) and D.1.5 as follows. Please note all subsequent D.1 conditions have been re-numbered accordingly.

### Compliance Determination Requirements

#### D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

- (a) The Permittee shall perform VOC testing on the 2.29 MM Btu/hr thermal oxidizer, identified as Millenium, by a method approved by the Commissioner, to determine the minimum operating temperature that will achieve 95.0% overall efficiency for this oxidizer. In addition to these requirements and pursuant to 326 IAC 2-1.1-11, IDEM may require compliance testing at any time to assure compliance with all applicable requirements.
- (b) Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).

#### D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with Condition D.1.1(b) (BACT).

Change 4: Reference of the new press and oxidizer has been added to Condition D.1.8, (formerly Condition D.1.7) as follows:

#### D.1.78 Volatile Organic Compound Control

When operating the printing press M850 and the, the printing press M130 (listed in Section D.2), and

**the printing press Lithoman**, the one (1) regenerative thermal oxidizer, **identified as Millenium, and the one (1) regenerative thermal oxidizer, identified as Cleanswitch**, shall maintain a minimum operating temperature of 1,600°F or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-1-6 satisfied.

Change 5: Press M130 is going to be ducted to the new thermal oxidizer, identified as Cleanswitch. Therefore, the facility description in Section D.2(d) has been revised as follows:

## SECTION D.2 FACILITY CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to one (1) stack, identified as 2;
- (d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris ~~M850~~ **M130** Upper Dryer and Harris ~~M850~~ **M130** Lower Dryer, each with a maximum heat input rate of 4.44 MMBtu/hr, exhausting to ~~one (1)~~ **two (2)** stacks, identified as Oxy 1 **or Oxy 2**;
- (e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches;
- (f) One (1) sheetfed UV Coater with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches; and
- (g) One (1) regenerative thermal oxidizer, identified as Millenium, using natural gas as a supplementary fuel at a maximum heat input rate of 2.29 MMBtu/hr, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130 and M850.

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

Change 6: The source has requested a VOC limit on all of the printing presses of less than 98.6 tons per year, to ensure compliance with the requirements of 326 IAC 2-8-4 (FESOP). Therefore, Condition D.2.4 has been replaced with a new Condition D.2.4 as follows:

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

~~D.2.4 FESOP Limit [326 IAC 2-8-4]~~~~[326 IAC 8-1-6]~~

~~VOC emissions from the printing press M130 and printing press M850 shall be controlled by the~~

~~regenerative thermal oxidizer, identified as Millenium, that maintains a minimum overall control efficiency of 95.0%. This limit will render the requirements of 326 IAC 2-7 not applicable.~~

**D.2.4 FESOP Limit [326 IAC 2-8-4][326 IAC 8-1-6]**

- (a) VOC emissions from the printing press, identified as Mark 16 (listed in Section D.1), the printing press, identified as M850 (listed in Section D.1), the printing press, identified as Lithoman (listed in Section D.1), the printing press, identified as Mark 6), the printing press, identified as M130, and the printing press, identified as Heidelberg Sheetfed Press, shall be limited to less than 98.6 tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit will be demonstrated by using the following equation:

$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Where:

<b>E<sub>n</sub></b>	<b>=</b>	<b>VOC emissions</b>
<b>U<sub>n</sub></b>	<b>=</b>	<b>Total usage of each material</b>
<b>V<sub>n</sub></b>	<b>=</b>	<b>VOC content of each material</b>
<b>F</b>	<b>=</b>	<b>Flash off factor of each material</b>
<b>C<sub>n</sub></b>	<b>=</b>	<b>Capture efficiency</b>
<b>D<sub>n</sub></b>	<b>=</b>	<b>Destruction efficiency (Oxidizer control efficiency)</b>

One of the regenerative thermal oxidizers, either Millenium or Cleanswitch, shall be in operation at all times the printing presses identified as M130 and M850 are in operation, to render the requirements of 326 IAC 8-1-6 not applicable.

- (b) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the one (1) printing press, identified as Lithoman has been determined to be:

**The use of the regenerative thermal oxidizer, identified as Cleanswitch, at all times the press is in operation.**

Change 7: Reference of the new press and oxidizer has been added to Condition D.2.10 as follows:

**D.2.10 Volatile Organic Compound Control**

When operating the printing press M130, ~~and the printing press M850 (listed in Section D.1),~~ **and the printing press Lithoman (listed in Section D.1)** the one (1) regenerative thermal oxidizer shall maintain a minimum operating temperature of 1,600°F or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-1-6 satisfied.

Change 8: All references to the Office of Air Management have been change to the Office of Air Quality, and all references to the IDEM, OAM have been changed to the IDEM, OAQ.

Change 9: A new FESOP Quarterly Report form has been added for the new VOC limit of less than 98.6 tons per year for all the printing presses.

Change 10: There is no necessary reporting required for Condition D.2.5. Therefore, Condition D.2.12 has been revised as follows:

#### D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.4 and D.2.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Change 11: The following insignificant activities have been added:

#### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (4) Eleven (11) natural gas fired HVAC units, ten (10) with a rating of 0.400 million british thermal units per hour, each, and one (1) with a rating of 0.350 million British thermal units per hour.**
- (j) Other activities or categories not previously identified:
  - (1) ~~Three (3)~~ **Four (4)** binding operations, identified as Fox Stitcher, Norm Binder, ~~and Kolbus Binder,~~ **and Kolbus K-2**, each with a maximum capacity of 560 pounds of paper per hour;
  - ~~(2) Two (2) binding operations, identified as Norm and Kolbus, each with a maximum capacity of 560 pounds per hour;~~
  - ~~(3) Film processor used to develop black and white film; and~~
  - (4) Five (5) Pplate processor used to develop printing plates;**
  - (4) One (1) casemaker, identified as Kolbus DA-36;**
  - (5) One (1) tipper, identified as Hunkeler VEA; and**
  - (6) Five (5) electric plate processing ovens.**

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

**FESOP Quarterly Report**

Source Name: Courier Kendallville, Inc.  
 Source Address: 2500 Marion Drive, Kendallville, Indiana 46755  
 Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755  
 FESOP No.: F113-12093-00021  
 Facilities: Six (6) printing presses (Mark 16, M850, Lithoman, Mark 6, M130, Heidelberg Sheetfed Press)  
 Parameter: VOC Emissions  
 Limit: 98.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:  

$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Where:

- En = VOC emissions
- Un = Total usage of each material
- Vn = VOC content of each material
- F = Flash off factor of each material
- Cn = Capture efficiency
- Dn = Destruction efficiency (Oxidizer control efficiency)

YEAR: \_\_\_\_\_

Month			
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

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

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Conclusion**

The construction of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 113-17840-00021.

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

**Company Name:** Courier Kendallville, Inc.  
**Address City IN Zip:** 2500 Marion Drive, Kendallville, Indiana 46755  
**SPR:** 113-17840  
**Pit ID:** 113-00021  
**Reviewer:** Craig J. Friederich  
**Date:** August 18, 2003

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin <sup>2</sup> /YEAR
Lithoman	2211	57	794877

INK VOCS							
Ink Name Press Id	Maxium Coverage (lbs/MMin <sup>2</sup> )	Weight % Volatiles*	Flash Off %	Thermal Oxidizer Destruction Efficiency %	Throughput (MMin <sup>2</sup> /Year)	Emissions (TONS/YEAR)	Controlled Emissions (TONS/YEAR)
Ink-Process Black	4	35% 0%	60.00% 0.00%	95.00%	794877	329.65	16.48
					794877	0.00	0.00
Ink-Process Blue	4	40% 0%	60.00% 0.00%	95.00%	794877	377.92	18.90
					794877	0.00	0.00
Ink-Process Red	4	41% 0%	60.00% 0.00%	95.00%	794877	386.69	19.33
					794877	0.00	0.00
Ink-Process Yellow	4	44% 0%	60.00% 0.00%	95.00%	794877	418.26	20.91
					794877	0.00	0.00
Fountain Solution (Emerald AMVP)	0.15	87% 0%	30.00% 0.00%	66.50%	794877	15.63	5.24
					794877	0.00	0.00
Cleaning Solvent (A-60 Odorless)	0.14	97% 0%	50.00% 0.00%	0.00%	794877	26.93	26.93
					794877	0.00	0.00
Cleaning Solvent (LPC)	0.14	92% 0%	50.00% 0.00%	0.00%	794877	25.71	25.71
					794877	0.00	0.00
Misc	0.001	100% 0%	75.00% 0.00%	0.00%	794877	0.30	0.30
					794877	0.00	0.00

Total VOC Emissions =	<b>461.12</b>	<b>Ton/yr</b>
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\*VOC (Tons/Year) = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) \* Flash off \* Throughput \* 1 Ton per 2000 pounds

Controlled VOC Emission	<b>53.4</b>	<b>Ton/Yr</b>
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**METHODOLOGY**

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.

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

VOC = Maximum Coverage pounds per MMin<sup>2</sup> \* Weight percentage volatiles (water minus organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year

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

**Company Name:** Courier Kendallville, Inc.  
**Address City IN Zip:** 2500 Marion Drive, Kendallville, Indiana 46755  
**SPR:** 113-17840  
**Pit ID:** 113-00021  
**Reviewer:** Craig J. Friederich

**UNCONTROLLED POTENTIAL HAP EMISSIONS**

Material	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	Maximum Coverage (lbs/MMin^2)	Flash Off %	Weight % Xylene	Weight % Hexane	Weight % Cumene	Weight % EthylBenzene	Xylene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Cumene Emissions (tons/yr)	EthylBenzene Emissions (tons/yr)
<b>Lithoman</b>												
Cleaning Solvent (A-60 Odorless)	2211	57	0.14	50.00%	5.00%	0.00%	5.00%	1.00%	1.39	0.00	1.39	0.28
Miscellaneous (3M Super 77 Spray)	2211	57	0.001	75.00%	0.00%	20.00%	0.00%	0.00%	0.00	0.06	0.00	0.00

**Total State Uncontrolled Potential Emissions**

**1.39      0.06      1.39      0.28**

**Total HAPs      3.12**

METHODOLOGY

Uncontrolled HAP Emissions (Tons/Year) = ((Maximum Line Speed (ft/min) \* Maximum Print Width (inches) \* 12 (inches/ft) \* 60 (min/hr) \* 8760 (hour/yr)) / 1,000,000) \* ((Maximum Coverage (lbs/MMin^2) \* flash off (%) \* weight % HAP) / 2000 (lbs/ton))

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler**

**Company Name: Courier Kendalville, Inc.  
 Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755  
 SPR: 113-17840  
 Pit ID: 113-00021  
 Reviewer: Craig J. Friederich  
 Date: August 18, 2003**

Dryer

Heat Input Capacity  
 MMBtu/hr

Potential Throughput  
 MMCF/yr

10.50

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Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.087	0.350	0.028	4.60	0.253	3.86

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

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

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler  
 HAPs Emissions**

**Company Name: Courier Kendalville, Inc.  
 Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755  
 SPR: 113-17840  
 Pit ID: 113-00021  
 Reviewer: Craig J. Friederich  
 Date: August 18, 2003**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.002	Dichlorobenzene 0.001	Formaldehyde 0.075	Hexane 1.80	Toluene 0.003
Potential Emission in tons/yr	0.0001	0.0001	0.003	0.083	0.0002

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.001	Cadmium 0.001	Chromium 0.001	Manganese 0.0004	Nickel 0.002	<b>Total</b>
Potential Emission in tons/yr	0.0000	0.0001	0.0001	0.00002	0.0001	<b>0.087</b>

Methodology is the same as page 3.

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  
Natural Gas Combustion Only  
MM BTU/HR <100  
Small Industrial Boiler**

**Company Name: Courier Kendallville, Inc.  
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755  
SPR: 113-17840  
Plt ID: 113-00021  
Reviewer: Craig J. Friederich  
Date: August 18, 2003**

**Thermal Oxidizer**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

0.81

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Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.007	0.027	0.002	0.355	0.020	0.298

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

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

See page 5 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler  
 HAPs Emissions**

**Company Name: Courier Kendalville, Inc.**  
**Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755**  
**SPR: 113-17840**  
**Pit ID: 113-00021**  
**Reviewer: Craig J. Friederich**  
**Date: August 18, 2003**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.002	Dichlorobenzene 0.001	Formaldehyde 0.075	Hexane 1.80	Toluene 0.003
Potential Emission in tons/yr	0.0000	0.0000	0.000	0.006	0.0000

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.001	Cadmium 0.001	Chromium 0.001	Manganese 0.0004	Nickel 0.002	<b>Total</b>
Potential Emission in tons/yr	0.0000	0.0000	0.0000	0.00000	0.0000	<b>0.007</b>

Methodology is the same as page 6.

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  
Natural Gas Combustion Only  
MM BTU/HR <100  
Insignificant Activities**

**Company Name: Courier Kendalville, Inc.  
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755  
SPR: 113-17840  
Plt ID: 113-00021  
Reviewer: Craig J. Friederich  
Date: August 18, 2003**

**11 HVAC Units**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

4.35

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Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.036	0.145	0.011	1.91	0.105	1.60

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

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

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler  
 HAPs Emissions**

**Company Name: Courier Kendallville, Inc.  
 Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755  
 SPR: 113-17840  
 Pit ID: 113-00021  
 Reviewer: Craig J. Friederich  
 Date: August 18, 2003**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.002	Dichlorobenzene 0.001	Formaldehyde 0.075	Hexane 1.80	Toluene 0.003
Potential Emission in tons/yr	0.0000	0.0000	0.001	0.034	0.0001

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.001	Cadmium 0.001	Chromium 0.001	Manganese 0.0004	Nickel 0.002	<b>Total</b>
Potential Emission in tons/yr	0.0000	0.0000	0.0000	0.00001	0.0000	<b>0.036</b>

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.