INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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

November 23, 2004

TO: Interested Parties / Applicant

RE: WebPlus, Inc. / 011-18412-00026

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) Renewal OFFICE OF AIR QUALITY

WebPlus, Inc.
720 Ransdell Road,
Lebanon, IN 46052

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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.

Operation Permit No.: F011-18412-00026	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:November 23, 2004 Expiration Date: November 23, 2009

SECTION A SOURCE SUMMARY 4
A.1 General Information [326 IAC 2-8-3(b)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
A.4 FESOP Applicability [326 IAC 2-8-2]
A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

SECTION B GENERAL CONDITIONS 6
B.1 Permit No Defense [IC 13]
B.2 Definitions [326 IAC 2-8-1]
B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]
B.4 Enforceability [326 IAC 2-8-6]
B.5 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
B.6 Severability [326 IAC 2-8-4(4)]
B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
B.8 Duty to Provide Information[326 IAC 2-8-4(5)(E)]
B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
B.12 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
B.13 Emergency Provisions [326 IAC 2-8-12]
B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
B.15 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]
B.16 Permit Renewal [326 IAC 2-8-3(h)]
B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
B.19 Permit Revision Requirement [326 IAC 2-8-11.1]
B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC13-14-2-2][IC 13-17-3-2][IC13-30-3-1]
B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]
B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314]

SECTION C SOURCE OPERATION CONDITIONS 15

Emission Limitations and Standards [326 IAC 2-8-4(1)]
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]
C.2 Overall Source Limit [326 IAC 2-8]
C.3 Opacity [326 IAC 5-1]
C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
C.6 Fugitive Dust Emissions [326 IAC 6-4]
C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]
C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]

Testing Requirements [326 IAC 2-8-4(3)]
C.9 Performance Testing [326 IAC 3-6]

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

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
C.12 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]
C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
C.14 Compliance Response Plan -Preparation, Implementation, Records, and Reports [326 IAC 2-8-4][326 IAC 2-8-5]
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]
C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection
C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS
Printing Press 22

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.1.2 New Facilities; General Reduction Requirements for Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements
D.1.4 Volatile Organic Compounds (VOC)
D.1.5 Volatile Organic Compound Control
D.1.6 VOC and HAP Emissions
D.1.7 Catalytic Oxidizer Temperature and Air Flow Rate
D.1.8 Parametric Monitoring

Testing Requirements [326 IAC 2-8-4(3)]
D.1.9 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]
D.1.10 Record Keeping Requirements
D.1.11 Reporting Requirements

Certification Form 26
Emergency Occurrence Form 27
Quarterly Report Form 29
Quarterly Deviation and Compliance Monitoring Report Form 30

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 stationary source for operation of heatset web offset printing press operation.

Authorized individual:	Plant Manager
Source Address:	720 Ransdell Road, Lebanon, IN 46052
Mailing Address:	720 Ransdell Road, P.O. Box 772, Lebanon, IN 46052
General Source Phone:	(765) 485-2778
SIC Code:	2752
Source Location Status:	Boone Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules; and Nonattainment NSR

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 half web press and dryer, identified as Press #1, with a maximum line speed of 1,260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #1, as control, and exhausting at one (1) stack, identified as stack 1.

(b) One (1) heat set web press and dryer, identified as Press #2, with a maximum line speed of 1,260 feet per minute and a maximum print width of 38 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #2, as control, and exhausting at one (1) stack, identified as stack 2.

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.

(b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

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

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

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

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)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

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 Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.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 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 an 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, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 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. All certifications 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 Branch, 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.12 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 maintain and implement Preventive Maintenance Plans (PMPs), 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.

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 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

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile 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). 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 accordance 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.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 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 Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] 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.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, 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 the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 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 shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(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)(2), (c)(1), and (d).

(b) 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).

(c) 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.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-17-3-2] [IC13-30-3-1]

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

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

B.21 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 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 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), 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 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(1) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

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

C.2 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, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);

(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) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) 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 the source's potential to emit does not exceed the above specified limits.

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

C.3 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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

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

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or 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 unit vented to the control equipment is in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(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 notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. 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 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.9 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 not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 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 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(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 as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and 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.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(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 response actions. The Permittee shall submit a description of these response 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 response 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 response action documents submitted pursuant to this condition do 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.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(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, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) heat set half web press and dryer, identified as Press #1, with a maximum line speed of 1,260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #1, as control, and exhausting at one (1) stack, identified as stack 1.

(b) One (1) heat set web press and dryer, identified as Press #2, with a maximum line speed of 1,260 feet per minute and a maximum print width of 38 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #2, as control, and exhausting at one (1) stack, identified as stack 2.

(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 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The total volatile organic compounds (VOC) input to the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2) shall be limited such that its controlled VOC emissions will be less than 100 tons per twelve (12) consecutive months period, with compliance determined at the end of each month, based on 80% flash off and:

(a) 95% overall VOC control efficiency by the catalytic oxidizer, identified as #2, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) web press and dryer, (ID Press #2), and

(b) 68% overall VOC control efficiency by the catalytic oxidizer, identified as #1, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) half web press and dryer, (ID Press #1).

Compliance with these limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.2 New Facilities; General Reduction Requirements for Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 which requires use of BACT, CP 011-2057-00026 issued on January 6, 1993 and FESOP No. 011-11070-00026 issued on October 6, 1999 the two (2) natural gas fired catalytic oxidizers identified as catalytic oxidizer #1 and #2, respectively, shall operate with a minimum temperature of 650^{o} F and 550^{o} F, respectively, or a temperature established during the latest stack test, and the minimum air flow rate shall be maintained at 3,410 acfm and 3,240 acfm, respectively, or an air flow rate established during the latest stack test. The catalytic oxidizer #2 shall have a capture efficiency of 100% and a control efficiency of 95%. The catalytic oxidizer #2 shall have a capture efficiency of at least 75% combined with destruction efficiency of 95% that will ensure an overall control efficiency of atleast 68%. The minimum temperature and air flow rates are permit limits requiring certification in accordance with General Condition B.10. Operation at or above the minimum temperature and air flow ensures compliance with the BACT requirements of 326 IAC 8-1-6.

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 this facility and its control device.

Compliance Determination Requirements

D.1.4 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) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. 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.1.5 Volatile Organic Compound Control

The capture system and the two (2) catalytic oxidizers, identified as catalytic oxidizer #1 and #2, shall be in operation at all times when the two (2) printing presses (Press #1 and #2) are in operation.

D.1.6 VOC and HAP Emissions

(a) Compliance with Condition D.1.1 shall be demonstrated within thirty (30) days of the end of each month based on the total volatile organic compound (VOC) usage for the most recent twelve (12) month period.

(b) Compliance with Condition D.1.1 shall be determined using the following equation for VOC usage: VOC usage = [(VOC input) x control efficiency x flash-off factor (80%)]

D.1.7 Catalytic Oxidizer Temperature and Air Flow Rate

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the two (2) catalytic oxidizers, identified as #1 and #2 used in conjunction with one (1) half web press and dryer, (ID Press #1) and one (1) web press and dryer (ID Press #2) for measuring operating temperature and air flow rate. The output of the temperature monitoring system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the catalytic oxidizers (burners) #1 and #2 at or above the 3-hour average temperature of 650^{o}F and 550^{o}F, respectively, and the minimum air flow rate shall be maintained at 3,410 acfm and 3,240 acfm, respectively.

(b) The Permittee shall determine the 3-hour average temperature and the appropriate air flow rates from the most recent valid stack tests that demonstrate compliance with limits in conditions D.1.1 and D.1.2, as approved by IDEM.

(c) On and after the date the approved stack tests results are available, the Permittee shall operate the catalytic oxidizers at or above the hourly average temperature and the minimum air flow rate as observed during the compliant stack tests.

D.1.8 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack tests that demonstrate compliance with limits in conditions D.1.1 and D.1.2, as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizers are in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack tests.

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

D.1.9 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee shall perform VOC testing on one (1) web press and dryer, (ID Press #2) and one (1) half web press and dryer, (ID Press #1) utilizing Methods 25 or 25A (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner within sixty (60) days of the issuance date of this permit. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

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

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly or as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.6.

(1) The quantity of VOC containing material used, including purchase orders, invoices, material safety data sheets (MSDS) or other supplier documentation necessary to verify the type and amount used;

(2) The VOC content of each coating material and solvent used;

(3) The weight of VOCs emitted for each compliance period, considering capture and control efficiencies; and

(4) The following operation parameters of each catalytic oxidizer:

(A) VOC capture efficiency;

(B) VOC destruction efficiency of the control device;

(C) A description of the data used to establish the capture and destruction efficiencies; and

(D) Continuous temperature readings.

(5) Continuous air flow rate readings.

(b) To document compliance with Condition D.1.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain continuous records of the combustion chamber temperature (on a 3-hour average basis) and air flow rates of the two (2) catalytic oxidizers, identified as #1 and #2 used in conjunction with the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2), when the heatset web offset printing presses are in operation and venting to the atmosphere.

(d) To document compliance with Condition D.1.8, the Permittee shall maintain daily records of the duct pressure or fan amperage of the two (2) catalytic oxidizers, identified as #1 and #2.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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 require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: WebPlus, Inc.
Source Address: 720 Ransdell Road, Lebanon, IN 46052
Mailing Address: 720 Ransdell Road, P.O. Box 772, Lebanon, IN 46052
FESOP No.: F011-18412-00026

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
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 OCCURRENCE REPORT

Source Name: WebPlus, Inc.
Source Address: 720 Ransdell Road, Lebanon, IN 46052
Mailing Address: 720 Ransdell Road, P.O. Box 772, Lebanon, IN 46052
FESOP No.: F011-18412-00026

This form consists of 2 pages **Page 1 of 2**

☐ 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**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
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

FESOP Quarterly Report

Source Name: WebPlus, Inc.
Source Address: 720 Ransdell Road, Lebanon, IN 46052
Mailing Address: 720 Ransdell Road, P.O. Box 772, Lebanon, IN 46052
FESOP No.: F011-18412-00026
Facility: Heatset Web Offset Printing Press Operation
Parameter: VOC
Limit: Controlled VOC emissions will be less than 100 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, based on 80% flash off and:

(a) 95% overall VOC control efficiency by the catalytic oxidizer, identified as #2, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) web press and dryer, (ID Press #2).

(b) 68% overall VOC control efficiency by the catalytic oxidizer, identified as #1, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) half web press and dryer, (ID Press #1).

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month	VOC Emissions Previous 11 Months	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

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

Source Name: WebPlus, Inc.
Source Address: 720 Ransdell Road, Lebanon, IN 46052
Mailing Address: 720 Ransdell Road, P.O. Box 772, Lebanon, IN 46052
FESOP No.: F011-18412-00026

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. 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

Permit Requirement (specify permit condition #)	Condition D.1.7
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

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 (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**WebPlus, Inc.**
Source Location:	**720 Ransdell Road, Lebanon, IN 46052**
County:	**Boone**
SIC Code:	**2752**
Operation Permit No.:	**F011-11070-00026**
Operation Permit Issuance Date:	**November 23, 2004**
Permit Renewal No.:	**F011-18412-00026**
Permit Reviewer:	**Gaurav Shil/EVP**

On July 16, 2004, the Office of Air Quality (OAQ) had a notice published in the Lebanon Reporter, Lebanon, IN stating that WebPlus, Inc. had applied for a FESOP renewal to operate heatset web offset printing press. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit 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 permit should be issued as proposed.

No comments were received on the proposed permit. However, upon further consideration, IDEM, OAQ has decided to make changes to the permit as indicated below. Changes made to the permit are shown in bold and deleted permit language is shown with a line through it. Any permit changes affecting the permit's Table of Contents and formatting changes are also made without replication herein.

1. Since Condition D.1.9 requires a performance test and there was no time limit for conducting the test Condition D.1.9 is revised as follows. Condition D.1.9 is also revised to include testing for Press #2. Testing requirement for Press #2 is necessary to establish the minimum operating parameters i.e. temperature, flow rate, duct pressure and fan amperage:

D.1.9 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee shall perform VOC testing on ~~the~~ one (1) web press and dryer, (ID Press #2) **and one (1) half web press and dryer, (ID Press #1)** utilizing Methods 25 or 25A (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner **within sixty (60) days of the issuance date of this permit**. ~~This test~~ **These tests** shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

2. Condition D.1.2 is revised to include the original FESOP and CP reference. Since the BACT determination in the original FESOP specifies the control efficiencies Condition D.1.2 is revised to include the efficiencies:

D.1.2 New Facilities; General Reduction Requirements for Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 which requires use of BACT**, CP 011-2057-00026 issued on January 6, 1993 and FESOP No. 011-11070-00026 issued on October 6, 1999** the two (2) natural gas fired catalytic oxidizers identified as catalytic oxidizer #1 and #2, respectively, shall operate with a minimum temperature of 650^{o} F and 550^{o} F, respectively, or a temperature established during the latest stack test, and the minimum air flow rate shall be maintained at 3,410 acfm and 3,240 acfm, respectively, or an air flow rate established during the latest stack test. **The catalytic oxidizer #2 shall have a capture efficiency of 100% and a control efficiency of 95%. The catalytic oxidizer #2 shall have a capture efficiency of at least 75% combined with destruction efficiency of 95% that will ensure an overall control efficiency of atleast 68%.**

The minimum temperature and air flow rates are permit limits requiring certification in accordance with General Condition B.10. Operation at or above the minimum temperature and air flow ensures compliance with the BACT requirements of 326 IAC 8-1-6.

3. Condition D.1.10 is revised to make it consistent with Condition D.1.7:

D.1.10 Record Keeping Requirements

(D) Continuous ~~or intermittent (minimum once per shift - not to exceed an 8 hour period)~~ temperature readings.

(5) Continuous ~~or intermittent (minimum once per shift - not to exceed an 8 hour period)~~ air flow rate readings.

4. Condition D.1.1 is revised as follows to delete reference to applicators for Press #1 and #2:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The total volatile organic compounds (VOC) ~~delivered to the applicators~~ **input** ~~of~~ **to** the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2) shall be limited such that its controlled VOC emissions will be less than 100 tons per twelve (12) consecutive months period, with compliance determined at the end of each month, based on 80% flash off and:

(a) 95% overall VOC control efficiency by the catalytic oxidizer, identified as #2, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) web press and dryer, (ID Press #2), and

(b) 68% overall VOC control efficiency by the catalytic oxidizer, identified as #1, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) half web press and dryer, (ID Press #1).

Compliance with these limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

5. Since the catalytic oxidizers are required for presses #1 and #2 pursuant to BACT requirement under 326 IAC 8-1-6 the temperature requirements on the catalytic oxidizers are included in the compliance determination section of the permit instead of the compliance monitoring section. The Permittee is required to determine the 3-hour average temperature for the catalytic oxidizers. Condition D.1.10 (d) is included in the permit to document compliance with Condition D.1.8. The permit is revised as follows:

D.1.7 Catalytic Oxidizer Temperature and Air Flow Rate

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the two (2) catalytic oxidizers, identified as #1 and #2 used in conjunction with one (1) half web press and dryer, (ID Press #1) and one (1) web press and dryer (ID Press #2) for measuring operating temperature and air flow rate. The output of the temperature monitoring system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the catalytic oxidizers (burners) #1 and #2 at or above the 3-hour average temperature of 650^{o}F and 550^{o}F, respectively, and the minimum air flow rate shall be maintained at 3,410 acfm and 3,240 acfm, respectively.

(b) The Permittee shall determine the 3-hour average temperature and the appropriate air flow rates from the most recent valid stack tests that demonstrate compliance with limits in conditions D.1.1 and D.1.2, as approved by IDEM.

(c) On and after the date the approved stack tests results are available, the Permittee shall operate the catalytic oxidizers at or above the 3-hour average temperature

and the minimum air flow rate as observed during the compliant stack tests.

D.1.8 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack tests that demonstrate compliance with limits in conditions D.1.1 and D.1.2, as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizers are in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack tests.

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

~~D.1.8 Catalytic Oxidizers~~

~~The Permittee shall record the combustion chamber temperature and air flow rates of the two (2) catalytic oxidizers, identified as #1 and #2 used in conjunction with the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2), continuously when the heatset web offset printing presses are in operation and venting to the atmosphere. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the catalytic oxidizers (burners) #1 and #2, shall be maintained at a minimum temperature of 650° F and 550° F, respectively, or a temperature established during the latest stack test, and the minimum air flow rate shall be maintained at 3,410 acfm and 3,240 acfm, respectively, or air flow rates established during the latest stack test. The Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the temperature of the catalytic oxidizers is lower than above mentioned. Temperatures that are below the temperatures mentioned above are not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.~~

D.1.10 Record Keeping Requirements

(d) To document compliance with Condition D.1.8, the Permittee shall maintain daily records of the duct pressure or fan amperage of the two (2) catalytic oxidizers, identified as #1 and #2.

6. Upon further review, the OAQ has determined that the following changes are made to the permit (changes made to the permit are shown in bold and deleted permit language is shown with a line through it):

(i) A statement was added to B.10 Certification in order to clarify that the certification form may cover more than one document that is submitted.

B.10 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 an 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, using the attached Certification Form, with each submittal requiring certification. **One (1) certification may cover multiple forms in one (1) submittal.**

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

(ii) A statement concerning backup fuel switches is being added to B.18 Operational Flexibility.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

(iii) B.23 Credible Evidence condition is included in the permit.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

(iii) A clarification of the term "Calendar Year" has been added to section (e) of C.17 General Reporting Requirements.

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

7. The authorized individual in Section A.1 General Information is changed as follows:

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

The Permittee owns and operates a stationary source for operation of heatset web offset printing press operation.

Authorized individual: ~~Robert Burger~~ **Plant Manager**

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**WebPlus, Inc.**
Source Location:	**720 Ransdell Road, Lebanon, IN 46052**
County:	**Boone**
SIC Code:	**2752**
Operation Permit No.:	**F011-11070-00026**
Operation Permit Issuance Date:	**November 23, 2004**
Permit Renewal No.:	**F011-18412-00026**
Permit Reviewer:	**Gaurav Shil/EVP**

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from WebPlus, Inc. relating to the operation of heatset web offset printing press.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) heat set half web press and dryer, identified as Press #1, with a maximum line speed of 1,260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #1, as control, and exhausting at one (1) stack, identified as stack 1.

(b) One (1) heat set web press and dryer, identified as Press #2, with a maximum line speed of 1,260 feet per minute and a maximum print width of 38 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #2, as control, and exhausting at one (1) stack, identified as stack 2.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Insignificant Activities

The source also consists of 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.

(b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

Existing Approvals

The source has been operating under the previous FESOP 011-11070-00026 issued on October 6, 1999, with an expiration date of October 6, 2004, and the following amendments and revisions:

(a) First Administrative Amendment 011-16527-00026 issued on September 24, 2001.

(b) First Reopening No. R011-13014-00026 issued on August 16, 2000.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP renewal 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 administratively complete FESOP renewal application for the purposes of this review was received on January 20, 2004.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 5)

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	0.05
PM-10	0.05
SO_2	0.00
VOC	118.15
CO	0.52
NO_x	0.61

HAPs	Unrestricted Potential Emissions (tons/yr)
Naphthalene	0.09
Total	0.09

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

	Potential To Emit (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_x	HAPs
One (1) half web press and dryer, (ID Press #1)*	0.00	0.00	0.00	11.22	0.00	0.00	0.03
One (1) web press and dryer, (ID Press #2)*	0.00	0.00	0.00	21.31	0.00	0.00	0.06
Insignificant Activities	0.05	0.05	0.00	0.03	0.52	0.61	negligible
Total Emissions	0.05	0.05	0.00	32.56	0.52	0.61	0.09

* VOC emissions from Press #1 and #2 shall be controlled by Catalytic Oxidizers #1 and #2 respectively to comply with 326 IAC 2-8 (FESOP) as listed in conditions D.1.1 and D.2.4 (now D.2.1). The two (2) Catalytic Oxidizers with have a control efficiency of 95%.

County Attainment Status

The source is located in Boone County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Boone County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

(b) Boone County has been classified as attainment or unclassifiable in Indiana for all other 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 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.05
PM-10	0.05
SO_2	0.00
VOC	18.36
CO	0.52
NO_x	0.61
Single HAP	0.09
Combination HAPs	0.09

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

Federal Rule Applicability

(a) The one (1) half web press and dryer, identified as Press #1 and the one (1) web press and dryer, identified as Press #2 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ) because the printing press is not a rotogravure printer.

(b) The one (1) half web press and dryer, identified as Press #1 and the one (1) web press and dryer, identified as Press #2 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.580, Subpart FFF) because the source does not have rotogravure printing line used to print or coat flexible vinyl or urethane products.

(c) The one (1) half web press and dryer, identified as Press #1 and the one (1) web press and dryer, identified as Press #2 are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), (40 CFR 63.820, Subpart KK) because the source is not a major source for HAPs and the printing process is not rotogravure or flexographic.

(d) The one (1) half web press and dryer, identified as Press #1 and the one (1) web press and dryer, identified as Press #2 are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), (40 CFR 63.4281, Subpart OOOO) because the source is not a major source for HAPs.

State Rule Applicability – Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source has submitted a Preventive Maintenance Plan (PMP) on June 16, 1999. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-6 (Emission Reporting)
This source is located in Boone County and the source is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Additionally, the source has no lead emissions. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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 the 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.

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the printing presses will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the total volatile organic compounds (VOC) delivered to the applicators of the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2) shall be limited such that its VOC emissions will not exceed 99 tons per twelve (12) month consecutive period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)

The operation of the printing presses is not subject to the requirements of 326 IAC 6-3-1. The source wide potential to emit of particulate matter is 0.011 pound per hour which is less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, 326 IAC 6-3-1 does not apply.

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

(a) Pursuant to CP 011-2057-00026 , issued on January 6, 1993, the Best Available Control Technology (BACT) for the one (1) web press and dryer, (ID Press #2) shall be that VOC emissions shall be controlled by the catalytic oxidizer, identified as #2, with a control efficiency of 95%, and the temperature of the discharge gas shall not be less than 550EF (or a temperature determined in the stack tests to effect at least 95% destruction of capture volatile organic compounds).

(b) Pursuant to CP 011-2057-00026 conditions 7 and 8, issued on January 6, 1993, capture efficiency for the one (1) half web press and dryer, (ID Press #1) shall be at least 75%. This efficiency, combined with the destruction efficiency of 95%, will assure an overall control efficiency of at least 68%. That temperature of discharge gas shall not be less than 650 °F (or a temperature determined in the stack tests to effect at least 95% destruction of capture volatile organic compounds). Proper operation of the capture system and catalytic incinerator, as verified by satisfaction of this condition, shall constitute Best Available Control Technology for this press and shall be deemed to satisfy the requirements of 326 IAC 8-1-6.

(c) Pursuant to 326 IAC 8-1-6 which requires use of BACT, the two (2) natural gas fired catalytic oxidizers identified as catalytic oxidizer #1 and #2, respectively, shall have minimum air flow rate maintained at 3,410 acfm and 3,240 acfm, respectively, or an air flow rate established during the latest stack test. This minimum air flow is a permit limit requiring certification by General Condition B.11. Operation at or above this minimum air flow ensures compliance with the BACT requirements of 326 IAC 8-1-6.

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

The heatset web offset printing press is not subject to 326 IAC 8-5-5 (Graphic Arts Operation). This rule applies to packaging rotogravure, publication rotogravure and flexographic printing sources.

Testing Requirements

All testing requirements from previous approvals were incorporated into this FESOP. This source is subject to 326 IAC 2-1.1-11 and 326 IAC 8-1-5 and shall perform VOC testing on the one (1) web press and dryer, (ID Press #2) utilizing Methods 25 or 25A (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance testing. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Previous stack tests to comply with this requirement were conducted as follows:

(a) VOC testing was performed on September 19, 1997 and most recently on July 29, 2003.

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 in 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 approporiate corrective actions within a specific time period.

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

(a) The one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2) has applicable compliance monitoring conditions as specified below:

(1) Pursuant to Condition D.1.4 in FESOP No. F011-11070-00026, the Permittee shall record the combustion chamber temperature of the two (2) catalytic oxidizers, identified as #1 and #2 used in conjunction with the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2), at least once daily when the heatset web offset printing presses are in operation when venting to the atmosphere. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the catalytic oxidizers #1 and #2, shall be maintained at a minimum temperature of 650^{o} F and 550^{o} F, respectively, or a temperature established during the latest stack test, and the minimum air flow rate shall be maintained at 3,410 acfm and 3,240 acfm, respectively, 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 then above mentioned.

These monitoring conditions are necessary because the catalytic oxidizers for the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2) must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

Conclusion

The operation of this heatset web offset printing press operation shall be subject to the conditions of the FESOP 011-18412-00026.

Appendix A: Emission Calculations

Company Name: WebPlus, Inc.
Address City IN Zip: 720 Ransdell Road, PO Box 772 Lebanon, IN 46052
FESOP: F011-18412-00026
Reviewer: GS/EVP
Date: 11/23/04

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	One (1) half web press and dryer, (ID Press #1)	One (1) half web press and dryer, (ID Press #2)	Natural Gas Combustion	**TOTAL**
PM	0.00	0.00	0.05	0.05
PM10	0.00	0.00	0.05	0.05
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.61	0.61
VOC	40.73	77.39	0.03	118.15
CO	0.00	0.00	0.52	0.52
total HAPs	0.03	0.06	neglegible	0.09
worst case single HAP	0.03	0.06	neglegible	
Total emissions based on rated capacity at 8,760 hours/year.				

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	One (1) half web press and dryer, (ID Press #1)	One (1) half web press and dryer, (ID Press #2)	Natural Gas Combustion	**TOTAL**
PM	0.00	0.00	0.05	0.05
PM10	0.00	0.00	0.05	0.05
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.61	0.61
VOC	11.22	21.31	0.03	32.56
CO	0.00	0.00	0.52	0.52
total HAPs	0.03	0.06	neglegible	0.09
worst case single HAP	0.03	0.06	neglegible	
	Naphthalene	Naphthalene		
Total emissions based on rated capacity at 8,760 hours/year, after control.				

Appendix A: Emissions Calculations
VOC From Printing Press Operations
Company Name: WebPlus, Inc.
Address City IN Zip: 720 Ransdell Road, PO Box 772 Lebanon, IN 46052
FESOP: F011-18412-00026
Reviewer: GS/EVP
Date: 11/23/04

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MM in^2/YEAR
Press #1	1260	20	158941

INK VOCS									
Ink Name / Press ID	Maximum Coverage (lbs/MM in^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/Year)	Percent Retained in Rag	Capture System Capture Efficiency	Thermal Oxidizer Destruction Efficiency	Emissions* (TONS/YEAR)	Controlled Emissions (TONS/YEAR)
Handschy Inks	1.018	48%	80.00%	158941	0.00%	100.00%	95.00%	31.07	1.55
Superior S-3474 Press Wash Cleaning	0.072	100%	80.00%	158941	0.00%	0.00%	0.00%	4.58	4.58
Hancofount Fountain Solution	0.1	80%	80.00%	158941	0.00%	0.00%	0.00%	5.09	5.09
						Total Uncontrolled VOC Emissions =		**40.73 Ton/yr**	
						Total Controlled VOC Emissions =		**11.22 Ton/yr**	

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Press #2	1260	38	301989

INK VOCS									
Ink Name / Press ID	Maximum Coverage (lbs/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/Year)	Percent Retained in Rag	Capture System Capture Efficiency	Thermal Oxidizer Destruction Efficiency	Emissions* (TONS/YEAR)	Controlled Emissions (TONS/YEAR)
Handschy Inks	1.018	48%	80.00%	301989	0.00%	100.00%	95.00%	59.03	2.95
Superior S-3474 Press Wash Cleaning	0.072	100%	80.00%	301989	0.00%	0.00%	0.00%	8.70	8.70
Hancofount Fountain Solution	0.1	80%	80.00%	301989	0.00%	0.00%	0.00%	9.66	9.66
						Total Uncontrolled VOC Emissions =		**77.39 Ton/yr**	
						Total Controlled VOC Emissions =		**21.31 Ton/yr**	

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
HAPs From Printing Press Operations
Company Name: WebPlus, Inc.
Address City IN Zip: 720 Ransdell Road, PO Box 772, Lebanon, IN 46052
FESOP: F011-18412-00026
Reviewer: GS/EVP
Date: 11/23/04

UNCONTROLLED POTENTIAL EMISSIONS

Material	Maximum Usage Rate (lbs/hr)	Flash Off %	Percent Retained in Rags	Capture System Capture Efficiency (%)	Thermal Oxidizer Destruction Efficiency (%)	Weight % Xylene	Weight % Vinyl Acetate	Weight % Naphthalene	Weight % Glycol Ethers	Weight % Cumene	Xylene Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Cumene Emissions (ton/yr)
Handschy Inks	18.47	80.00%	0.00%	100.00%	95.00%						0.00	0.00	0.00	0.00	0.00
Superior S-3474 Press Wash Cleaning	1.31	80.00%	0.00%	100.00%	0.00%			2.70%			0.00	0.00	0.03	0.00	0.00
Hancofount Fountain Solution	1.81	80.00%	0.00%	100.00%	0.00%						0.00	0.00	0.00	0.00	0.00
											0.00	0.00	0.00	0.00	0.00
											0.00	0.00	0.00	0.00	0.00
Handschy Inks	35.09	80.00%	0.00%	100.00%	95.00%						0.00	0.00	0.00	0.00	0.00
Superior S-3474 Press Wash Cleaning	2.48	80.00%	0.00%	100.00%	0.00%			2.70%			0.00	0.00	0.06	0.00	0.00
Hancofount Fountain Solution	3.45	80.00%	0.00%	100.00%	0.00%						0.00	0.00	0.00	0.00	0.00
											0.00	0.00	0.00	0.00	0.00
Total State Uncontrolled Potential Emissions											**0.00**	**0.00**	**0.09**	**0.00**	**0.00**

TOTAL UNCONTROLLED HAPS	**0.09 Ton/yr**
TOTAL CONTROLLED HAPS	**0.09 Ton/yr**

METHODOLOGY

Uncontrolled Emissions (Tons/Year) = Maximum Usage Rate (lbs/hr) * (% HAP) * (1 - %substrate) * (1 - % retained in rags)
Controlled Emissions (Tons/Year) = [Maximum Usage Rate (lbs/hr) * (% HAP) * (1 - %substrate) * (1 - % retained in rags)] * [1 - (% capture efficiency * % control efficiency)]

Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 100
Small Industrial Boiler

Company Name: Webplus, Inc.
Address City IN Zip: 720 Ransdell Road, PO Box 772 Lebanon, IN 46052
FESOP: F011-18412-00026
Reviewer: GS/EVP
Date: 06/29/04

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.404	12.3

Heat Input Capacity includes:
Catalytic Oxidizer #1, with a supplementary fuel heat input rate of 0.54 MMBtu/hr of natural gas
Catalytic Oxidizer #2, with a supplementary fuel heat input rate of 0.864 MMBtu/hr of natural gas

	Pollutant					
	PM	**PM10**	**SO2**	**NOx**	**VOC**	**CO**
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.05	0.05	0.00	0.61	0.03	0.52

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32

All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 emissions.
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-01-006-02, #1-02-006-02, #1-03-006-02, #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 100
Small Industrial Boiler
HAPs Emissions

Company Name: Webplus, Inc.
Address City IN Zip: 720 Ransdell Road, PO Box 772 Lebanon, IN 46052
FESOP: F011-18412-00026
Reviewer: GS/EVP
Date: 11/23/04

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.291E-05	7.379E-06	4.612E-04	1.107E-02	2.091E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.075E-06	6.764E-06	8.609E-06	2.337E-06	1.291E-05

Methodology is the same as page 4.

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