



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

November 3, 2004

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

TO: Interested Parties / Applicant

RE: Elkhart Truth Publishing Company / 039-19405-00259

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

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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
FN-REGIS.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

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Commissioner

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Brandon S. Erlacher
Elkhart Truth Publishing Company
421 South Second Street
Elkhart, IN 46516

November 3, 2004

Re: Registered Operation Status,
R039-19405-00269

Dear Mr. Erlacher:

The application from Elkhart Truth Publishing Company, received on July 26, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following printing line which prints daily newspapers, to be located at 421 South Second Street, Elkhart, Indiana 46516 is classified as registered:

- (a) One (1) printing line identified as Harris N-1650, consisting of five (5) Web offset printing presses identified as Unit 1 through Unit 5, with a maximum line speed of 1600 feet per minute and a maximum printing width of fifty (50) inches, exhausting inside the building;
- (b) One (1) natural gas-fired boiler identified as B1, installed on August 4, 1964, with a maximum heat input rate of 4.6 million (MM) British thermal units (Btu) per hour, exhausting inside the building;
- (c) Two (2) natural gas-fired boilers identified as B2 and B3, both installed on March 1, 1973, each with a maximum heat input rate of 0.9 MMBtu per hour, exhausting inside the building;
- (d) Image processing and transfer facilities;
- (e) Equipment cleaning solvents and washes; and
- (f) Three (3) natural gas fired furnaces with a total heat input rate of 0.21 MMBtu per hour.

The following conditions shall be applicable:

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%) 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.

Pursuant to 326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating), the one (1) 4.6 MMBtu/hr natural gas fired boiler (identified as B1), constructed on August 4, 1964 is subject to a default particulate matter emission limit of 0.8 pounds per million (MM) Btu of heat input.

Pursuant to 326 IAC 6-2-3(e) (Particulate Emission Limitations for Sources of Indirect Heating), the two (2) 0.9 MMBtu/hr natural gas fired boilers (identified as B2 and B3), constructed on March 1, 1973 are subject to a default particulate matter emission limit of 0.6 pounds per million (MM) Btu of heat input each.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3)). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) and Office of Environmental Services (OES) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SR/EVP

cc: File – Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector – Paul Karkiewicz
Compliance Data Section
Administrative and Development

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	Elkhart Truth Publishing Company
Address:	421 South Second Street, Elkhart, IN 46516
City:	Elkhart
Authorized individual:	Brandon S. Erlacher
Phone #:	(574) 296-5882
Registration #:	039-19405-00269

I hereby certify that Elkhart Truth Publishing Company is still in operation and is in compliance with the requirements of Registration 039-19405-00269.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Re-Registration

Source Background and Description

Source Name: Elkhart Truth Publishing Company
Source Location: 421 South Second Street, Elkhart, IN 46516
County: Elkhart
SIC Code: 2711
Operation Permit No.: R039-19405-00269
Permit Reviewer: Seema Roy / EVP

The Office of Air Quality (OAQ) has reviewed a registration application from Elkhart Truth Publishing Company relating to the operation of a printing line, which prints daily newspapers.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) printing line identified as Harris N-1650, installed in 1973, consisting of five (5) Web offset printing presses identified as Unit 1 through Unit 5, with a maximum line speed of 1600 feet per minute and a maximum printing width of fifty (50) inches, exhausting inside the building;
- (b) One (1) natural gas-fired boiler identified as B1, installed on August 4, 1964, with a maximum heat input rate of 4.6 million (MM) British thermal units (Btu) per hour, exhausting inside the building;
- (c) Two (2) natural gas-fired boilers identified as B2 and B3, both installed on March 1, 1973, each with a maximum heat input rate of 0.9 MMBtu per hour, exhausting inside the building;
- (d) Image processing and transfer facilities;
- (e) Equipment cleaning solvents and washes; and
- (f) Three (3) natural gas fired furnaces with a total heat input rate of 0.21 MMBtu per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

Adjustments due to this Revision

The maximum printing width has been decreased from 54 inches to 50 inches by modification of the existing printing line Harris N-1650 in 2001. Digital imaging process was updated in 2001 with new imagers. The natural gas-fired boilers were fitted with electronic ignition. Three (3) natural gas-fired furnaces, used to heat the office were not identified previously in the registration. They have been included in this Registration.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Registration No. 039-11783-00269, issued on April 13, 2000.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation 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.

A complete application for the purposes of this review was received on July 26, 2004.

Emission Calculations

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

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	0.06
PM-10	0.22
SO ₂	0.02
VOC	10.07
CO	2.43
NO _x	2.90

HAPs	Potential to Emit (tons/yr)
Xylene	0.25
Cumene	0.20
Napthalene	0.05
Hexane	0.01
Total	0.51

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 25 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-6.1.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is greater than levels listed in 326 IAC 2-1.1-3(d)(1)(E), therefore the source is subject to the provisions of 326 IAC 2-5.5.1. A registration will be issued.
- (e) **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.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Maintenance Attainment
8-hour Ozone	Basic Non-Attainment
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. Elkhart 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) Elkhart County has been classified as attainment or unclassifiable in Indiana for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD 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	0.06
PM-10	0.22
SO ₂	0.02
VOC	10.07
CO	2.43
NO _x	2.90
Single HAP	0.26
Combination HAPs	0.51

- (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.
- (b) This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.
- (c) These emissions were based on Registration No. R039-11783-00269, issued on April 13, 2000.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, with total emissions as indicated in this permit R-039-19405-00269, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year;
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year; and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on the PTE calculations (see Appendix A).

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart Dc) are not included in the permit for the three (3) natural gas fired boilers, B1, B2 and B3. Construction of these units commenced prior to June 9, 1989.
- (b) The one (1) printing line identified as Harris N-1650, consisting of five (5) Web offset printing presses identified as Unit 1 through Unit 5, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart QQ), because the five (5) printing presses are not publication rotogravure printing presses.
- (c) The one (1) printing line identified as Harris N-1650, consisting of five (5) Web offset printing presses identified as Unit 1 through Unit 5, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart KK because the five (5) printing presses are not publication rotogravure, packaging rotogravure or wide-web flexographic printing presses.

- (d) The three (3) natural gas fired boilers B1, B2 and B3 are not subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD because they are not located at a major source of HAP as defined in 40 CFR 63.2

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

All the facilities at this existing source were constructed prior to the August 7, 1977 rule applicability date and the source has a potential to emit air pollutants that are less than 250 tons per year and it is not in 1 of 28 listed source categories. Therefore, the source is not subject to the provisions of 326 IAC 2-2.

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

The source emits less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is complying with 326 IAC 2-5.5.1 and is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is not subject to 326 IAC 2-6 (Emission Reporting).

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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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 6-2-3 (Particulate Emission Limitations for Facilities Specified in 326 IAC 6-2-1(c))

This rule establishes limitations for sources of indirect heating existing and in operation before September 21, 1983.

- (a) The one (1) 4.6 MMBtu/hr natural gas fired boiler (identified as B1) was constructed on August 4, 1964 and pursuant to 326 IAC 6-2-3(d), is subject to a default particulate matter emission limit of 0.8 pounds per million (MM) Btu of heat input. Based on the calculation, the particulate matter emission from this boiler is 0.002 pound per MMBtu heat input (see page 4 of 5, Appendix A). Therefore, the boiler will comply with 326 IAC 6-2-3.
- (b) The two (2) 0.9 MMBtu/hr natural gas fired boilers (identified as B2 and B3) were constructed on March 1, 1973 and pursuant to 326 IAC 6-2-3(e), are subject to a default particulate matter emission limit of 0.6 pounds per million (MM) Btu of heat input each. Based on the calculation, the particulate matter emission from each of the boiler is 0.003 pound per MMBtu heat input (see page 4 of 5, Appendix A). Therefore, the boilers will comply with 326 IAC 6-2-3.

326 IAC 8-1-6 (General Reduction Requirements)

The printing presses are not subject to the provisions of 326 IAC 8-1-6. This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of greater than or equal to 25 tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). The presses were constructed in 1973, prior to the January 1, 1980 rule applicability date and have a total potential to emit VOC of less than 25 tons per year.

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

This rule establishes emission limitations for web coating or saturation processes of paper, plastic, metal foil, and pressure sensitive tapes and labels regardless of substrate, existing as of January 1980, which are located at sources in the counties listed in 326 IAC 8-2-1(a) and which have potential emissions of ninety and seven-tenths (90.7) megagrams (one hundred (100) tons) or greater per year of VOC. This source does not have potential VOC emissions of 100 tons per or more. Therefore, this rule does not apply to this source.

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

The printing line (identified as Harris N-1650) is not subject to the requirements of 326 IAC 8-5-5, because the five (5) printing presses do not involve packaging rotogravure, publication rotogravure or flexographic printing.

Conclusion

The renewed operation of this printing line shall be subject to the conditions of the attached proposed **R039-19405-00269**.

Appendix A: Emission Calculations

Company Name: Elkhart Truth Publishing Company
Address City IN Zip: 421 South Second Street, Elkhart, IN 46516
Registration Renewal No.: 039-19405-00269
Permit Reviewer: Seema Roy / EVP

Uncontrolled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Natural Gas Combustion	Printing Press	TOTAL
PM	0.06	0.00	0.06
PM10	0.22	0.00	0.22
SO2	0.02	0.00	0.02
NOx	2.90	0.00	2.90
VOC	0.16	9.91	10.07
CO	2.43	0.00	2.43
total HAPs	0.01	0.50	0.51
worst case single HAP	0.01	0.25	0.26
Total emissions based on rated capacity at 8,760 hours/year.			
Controlled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Natural Gas Combustion	Printing Press	TOTAL
PM	0.06	0.00	0.06
PM10	0.22	0.00	0.22
SO2	0.02	0.00	0.02
NOx	2.90	0.00	2.90
VOC	0.16	9.91	10.07
CO	2.43	0.00	2.43
total HAPs	0.01	0.50	0.51
worst case single HAP	0.01	0.25	0.26
Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits.			

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

Company Name: Elkhart Truth Publishing Company
Address City IN Zip: 421 South Second Street, Elkhart, IN 46516
Registration Renewal No.: 039-19405-00269
Reviewer: Seema Roy / EVP

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
Harris N-1650	1600	50	504576

INK VOCS					
Ink Name Press Id	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /Year)	Emissions* (TONS/YEAR)
Black Ink, NHNP Low Rub (Oil) Color Ink (Soy) (Worse Case, Yellow)**	0.854	12.8%	5.00%	504576	1.38
	0.18	7.5%	5.00%	504576	0.17
Blanket Wash Y-911 Blanket Wash Y-995	0.031	96.0%	100.00%	504576	7.51
	0.003	30.0%	100.00%	504576	0.23
Bleach Sanitizer Mobile Mist Lube 27	0.001	0.0%	100.00%	504576	0.00
	0	0.0%	100.00%	504576	0.00
Dead Unit Compound Reprofix 800L Fixer Part A	0	0.0%	100.00%	504576	0.00
	0.047	0.0%	100.00%	504576	0.00
Reprofix 800L Fixer, Part B Hardener Subtractive Developer SD 100	0.001	0.0%	100.00%	504576	0.00
	0.023	10.8%	100.00%	504576	0.63
Subtractive Finisher SF100 AFGA G101P Developer Part A	0	0.0%	100.00%	504576	0.00
	0	0.0%	100.00%	504576	0.00
AFGA G101P Developer Part B RE-Con Plate Cleaner	0	0.0%	0.00%	504576	0.00
	0	90.0%	100.00%	504576	0.00

Total VOC Emissions =	9.91 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin² * 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 = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

**The 5 % Flash Off is based on AP 42 Table 4.9.1-1 (Typical Parameters for Computing Solvent Emissions from Printing Lines)

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: Emission Calculations
HAP Emission Calculations

Company Name: Elkhart Truth Publishing Company
Address City IN Zip: 421 South Second Street, Elkhart, IN 46516
Registration Renewal No.: 039-19405-00269
Permit Reviewer: Seema Roy / EVP

Material	Density (Lb/Gal)	Pounds of Material (lbs/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Cumene	Weight % Napthalene	Weight % Hydroquinone	Weight % Glycol Ether	Xylene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Napthalene Emissions (ton/yr)	Hydroquinone Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)
Blanket Wash Y-911	7.01	0.031000	37.23	5.00%	4.00%	0.00%	0.00%	0.00%	0.25	0.20	0.00	0.00	0.00
Blanket Wash Y-995	6.34	0.003000	37.23	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.05	0.00	0.00
AFGA G101P Developer Part B	1.00	0.000000	37.23	0.00%	0.00%	0.00%	5.00%	0.00%	0.00	0.00	0.00	0.00	0.00
RE-Con Plate Cleaner	8.62	0.000000	37.23	0.00%	0.00%	0.00%	0.00%	5.00%	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions **0.25 0.20 0.05 0.00 0.00**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

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

Company Name: Elkhart Truth Publishing Company
Address City IN Zip: 421 South Second Street, Elkhart, IN 46516
Registration Renewal No.: 039-19405-00269
Permit Reviewer: Seema Roy / EVP

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
6.6	57.9

Facilities	MMBtu/hr
Furnaces (3)	0.21
Boiler (B1)	4.6
Boiler (B2)	0.9
Boiler (B3)	0.9
Total	6.61

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.06	0.22	0.02	2.90	0.16	2.43

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

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

Company Name: Elkhart Truth Publishing Company
Address City IN Zip: 421 South Second Street, Elkhart, IN 46516
Registration Renewal No.: 039-19405-00269
Permit Reviewer: Seema Roy / EVP

HAPs - Organics

	Benzene	e	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	6.080E-05	3.474E-05	2.171E-03	5.211E-02	9.844E-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	1.448E-05	3.185E-05	4.053E-05	1.100E-05	6.080E-05

Methodology is the same as page 4.

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