



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: May 19, 2005  
RE: Bowne of South Bend / 141-19482-00179  
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 1/10/05



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## MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Bowne of South Bend  
5021 Nimitz Parkway  
South Bend, Indiana 46628**

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

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

Operation Permit No.: MSOP 141-19482-00179	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 19, 2005  Expiration Date: May 19, 2010

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary printing facility.

Authorized Individual: Vice President  
Source Address: 5021 Nimitz Parkway, South Bend, Indiana 46628  
Mailing Address: 5021 Nimitz Parkway, South Bend, Indiana 46628  
General Source Phone: (574) 251-4000  
SIC Code: 2759  
County Location: St. Joseph  
Source Location Status: Nonattainment area for ozone under the 8-hour standard  
Attainment area for all other criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD and Emission Offset Rules  
Minor Source, Section 112 of the Clean Air Act  
Not 1 of 28 Source Categories

### A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) paper cutting operation, with a maximum throughput rate of 1,850 pounds of paper per hour, controlled by a dust collector.
- (b) Two (2) parts cleaning stations, each with a maximum solvent usage less than 145 gallons per 12 months.
- (c) Three (3) non-heatset offset printing presses, identified as M130-01, M130-02, and V30, constructed in 1998, 1999, and 1998, each with a maximum printing speed of 1,422 ft/min and a maximum printing width of 38 inches.
- (d) One (1) sheet fed Misubishi printing press, identified as Mitsubishi, constructed in 1998, with a maximum printing speed of 13,000 sheets per hour.
- (e) One (1) sheet fed Miller printing press, identified as Miller, constructed in 2002, with a maximum printing speed of 10,000 sheets per hour.
- (f) One (1) non-heatset offset printing press, identified as V25, constructed in 2001, with a maximum printing speed of 1,000 ft/min and a maximum printing width of 38 inches.
- (g) Thirty-one (31) natural gas fired space heaters, with a total maximum heat input capacity of 11.7 MMBtu/hr.
- (h) One (1) back-up natural gas fired generator, constructed after 1999, with a maximum heat input capacity of 0.92 MMBtu/hr.

**SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

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

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

**B.2 Definitions**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

**B.3 Effective Date of the Permit [IC13-15-5-3]**

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

**B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

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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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

**B.5 Modification to Permit [326 IAC 2]**

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All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

**B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, Indiana 46204

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**B.7 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

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

- (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 PMP's 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 PMP 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 an "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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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  
Indianapolis, Indiana 46204

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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.

**B.11 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.12 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

### C.3 Opacity [326 IAC 5-1]

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

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

### C.4 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  
Indianapolis, Indiana 46204

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 an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (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.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.5 Compliance Requirements [326 IAC 2-1.1-11]**

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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

#### C.6 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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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.

### Record Keeping and Reporting Requirements

#### C.7 Malfunctions Report [326 IAC 1-6-2]

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

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

#### C.8 General Record Keeping Requirements [326 IAC 2-6.1-5]

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- (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 when operation begins.

#### C.9 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (a) 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

Indianapolis, Indiana 46204

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-6.1]:

- (a) One (1) paper cutting operation, with a maximum throughput rate of 1,850 pounds of paper per hour, controlled by a dust collector.

(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 2-6.1]

#### D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the paper cutting operation shall not exceed 3.89 pounds per hour when operating at a process weight rate of 1,850 lbs/hr.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-6.1]:

- (b) Two (2) parts cleaning stations, each with a maximum solvent usage less than 145 gallons per 12 months.

(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 2-6.1]

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for a cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-6.1]:

- (c) Three (3) non-heatset offset printing presses, identified as M130-01, M130-02, and V30, constructed in 1998, 1999, and 1998, each with a maximum printing speed of 1,422 ft/min and a maximum printing width of 38 inches.
- (d) One (1) sheet fed Mitsubishi printing press, identified as Mitsubishi, constructed in 1998, with a maximum printing speed of 13,000 sheets per hour.
- (e) One (1) sheet fed Miller printing press, identified as Miller, constructed in 2002, with a maximum printing speed of 10,000 sheets per hour.
- (f) One (1) non-heatset offset printing press, identified as V25, constructed in 2001, with a maximum printing speed of 1,000 ft/min and a maximum printing width of 38 inches.
- (g) Thirty-one (31) natural gas fired space heaters, with a total maximum heat input capacity of 11.7 MMBtu/hr.
- (h) One (1) back-up natural gas fired generator, constructed after 1999, with a maximum heat input capacity of 0.92 MMBtu/hr.

(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 2-6.1]

There are no specifically applicable requirements for these units.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	<b>Bowne of South Bend</b>
<b>Address:</b>	<b>5021 Nimitz Parkway</b>
<b>City:</b>	<b>South Bend, Indiana 46628</b>
<b>Phone #:</b>	<b>(574) 251-4000</b>
<b>MSOP #:</b>	<b>141-19482-00179</b>

I hereby certify that Bowne of South Bend is  still in operation.  
 no longer in operation.

I hereby certify that Bowne of South Bend is  in compliance with the requirements of MSOP 141-19482-00179.  
 not in compliance with the requirements of MSOP 141-19482-00179.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_        AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_        AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

PAGE 1 OF 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document for a Minor Source Operating Permit

### Source Background and Description

Source Name:	Bowne of South Bend
Source Location:	5021 Nimitz Parkway, South Bend, Indiana 46628
County:	St. Joseph
SIC Code:	2759
Operation Permit No.:	141-19482-00179
Permit Reviewer:	ERG/YC

On March 23, 2005, the Office of Air Quality (OAQ) had a notice published in the LaGrange Standard, LaGrange, Indiana, stating that Bowne of South Bend had applied for a Minor Source Operating Permit relating to the operation of a printing facility. 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.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

- 1 In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (U.S. EPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, U.S. EPA will object to the permits. IDEM, OAQ is required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Therefore, IDEM, OAQ has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule became effective March 16, 2005 and was incorporated into your permit as follows:

#### **B.12 Credible Evidence [326 IAC 1-1-6]**

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

2. St. Joseph County has been classified as unclassifiable or attainment for PM 2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM 2.5 emissions, it has directed states to regulate PM10

emissions as surrogate for PM 2.5 emissions. As a result of this change, the County Attainment Status section in the Technical Support Document should read as follows:

Pollutant	Status
PM-10	Attainment
<b>PM-2.5</b>	<b>Attainment or Unclassifiable</b>
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

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

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

**Source Background and Description**

Source Name:	Bowne of South Bend
Source Location:	5021 Nimitz Parkway, South Bend, Indiana 46628
County:	St. Joseph
SIC Code:	2759
Operation Permit No.:	141-19482-00179
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed an application from Bowne of South Bend relating to the operation of a printing facility.

**Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) paper cutting operation, with a maximum throughput rate of 1,850 pounds of paper per hour, controlled by a dust collector.
- (b) Two (2) parts cleaning stations, each with a maximum solvent usage less than 145 gallons per 12 months.
- (c) Three (3) non-heatset offset printing presses, identified as M130-01, M130-02, and V30, constructed in 1998, 1999, and 1998, each with a maximum printing speed of 1,422 ft/min and a maximum printing width of 38 inches.
- (d) One (1) sheet fed Mitsubishi printing press, identified as Mitsubishi, constructed in 1998, with a maximum printing speed of 13,000 sheets per hour.
- (e) One (1) sheet fed Miller printing press, identified as Miller, constructed in 2002, with a maximum printing speed of 10,000 sheets per hour.
- (f) One (1) non-heatset offset printing press, identified as V25, constructed in 2001, with a maximum printing speed of 1,000 ft/min and a maximum printing width of 38 inches.
- (g) Thirty-one (31) natural gas fired space heaters, with a total maximum heat input capacity of 11.7 MMBtu/hr.
- (h) One (1) back-up natural gas fired generator, constructed after 1999, with a maximum heat input capacity of 0.92 MMBtu/hr.

**Unpermitted Emission Units and Pollution Control Equipment**

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

**New Emission Units and Pollution Control Equipment**

There are no new emission units or pollution control equipment at this source.

## Existing Approvals

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

- (a) CP #141-9011-00179, issued January 15, 1998.
- (b) Notice-only Change 141-14466-00179, issued July 18, 2001.

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.

An application for the purposes of this review was received on June 17, 2004. Additional information was received on February 10, 2005.

## Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 8). The potential to emit HAP calculations for the printing presses submitted by the applicant have been verified and found to be accurate and correct. The HAP calculations for the printing presses are not included in the Appendix A.

## 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	4.44
PM10	4.44
SO <sub>2</sub>	0.03
VOC	27.1
CO	4.39
NO <sub>x</sub>	5.85

HAPs	Potential to Emit (tons/yr)
Ethylene Glycol	2.54
Other HAPs	1.07
Total	3.61

\* Note: Potential to emit HAP was calculated by the Permittee.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all 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 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) 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 2-1.1-1(16)) of VOC is greater than 25 tons per year, therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (d) **Fugitive Emissions**  
Since this type of operation is not in 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 or Emission Offset applicability.

### County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Basic 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. St. Joseph County has been designated as basic nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) St. Joseph 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 in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD or Emission Offset applicability.

### Source Status

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

Pollutant	Emissions (tons/yr)
PM	4.44
PM-10	4.44
SO <sub>2</sub>	0.03
VOC	27.1
CO	4.39
NO <sub>x</sub>	5.85
Total HAPs	3.61

- (a) This existing source is not an Emission Offset major stationary source because no nonattainment 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. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.
- (b) This existing source is not a PSD major stationary source because no attainment 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. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) These emissions are based on the potential to emit of this source (see Appendix A).

#### Part 70 Permit Determination

##### 326 IAC 2-7 (Part 70 Permit Program)

This existing source 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 per year.

This status is based on all the air approvals issued to the source.

#### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The New Source Performance Standards for Publication Rotogravure Printing (326 IAC 12, 40 CFR 60.430-60.453, Subpart QQ) are not applicable. This source does not have a rotogravure printing line.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.
- (d) The National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry (326 IAC 20, 40 CFR 63.820 - 63.839, Subpart KK) are not applicable. This source is not a major source for HAPs.
- (e) The National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Paper and Other Web Coating (326 IAC 20, 40 CFR 63.3280 - 63.3420, Subpart JJJJ) are not applicable. This source is not a major source for HAPs.

### **State Rule Applicability – Entire Source**

#### **326 IAC 2-3 (Emission Offset)**

This source is located in St. Joseph County, which has been designated as a nonattainment area for the 8-hour Ozone standard in June 2004. The potential to emit VOC and NO<sub>x</sub> of this source are each less than 100 tons/year. Therefore, this source is a minor source under Emission Offset.

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

This existing source is not in 1 of the 28 source categories defined in 326 IAC 2-2-1(p)(1) and the potential to emit of PM, PM<sub>10</sub>, SO<sub>2</sub>, and CO are less than 250 tons/year. Therefore, this source is a PSD minor source.

#### **326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)**

The potential to emit HAPs from this existing source is less than 10 tons/year for a single HAP and less than 25 tons/year for any combination HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

#### **326 IAC 2-6 (Emission Reporting)**

This source is located in St. Joseph County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year (i.e., does not require a Part 70 Permit). Therefore, 326 IAC 2-6 does not apply.

#### **326 IAC 5-1 (Opacity Limitations)**

This source is located in St. Joseph County and is located north of Kern Road and east of Pine Road. 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

### **State Rule Applicability – Six (6) Printing Presses**

#### **326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)**

Each of the six (6) printing presses at this source has potential VOC emissions less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

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

This source does not have any rotogravure and flexographic printing presses. Therefore, the requirements of 326 IAC 8-5-5 are not applicable.

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

This source does not perform web coating or saturation processes of paper, plastic, metal foil, and pressure sensitive tapes and labels. Therefore, the requirements of 326 IAC 8-2-5 are not applicable.

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

Printing presses are not sources of particulate emissions. Therefore, the requirements of 326 IAC 6-3-2 are not applicable.

### **State Rule Applicability – Paper Cutting Operation**

#### **326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations)**

This source is located in St. Joseph County and is not specifically listed in Sections 326 IAC 6-1-8.1 through 326 IAC 6-1-18. This source does not have a potential to emit PM greater than 100 tons/year or actual PM emissions greater than 10 tons/year. Therefore, this source is not subject to 326 IAC 6-1.

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

Particulate emissions from the paper cutting operation shall be limited to 3.89 lbs/hr when the process weight rate is 1,850 lbs/hr.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

According to the emission calculations (see Appendix A), the potential to emit PM from the paper cutting operation is less than the particulate emission limit above. Therefore, this paper cutting operation is in compliance with 326 IAC 6-3-2.

### **State Rule Applicability – Parts Cleaning Stations**

#### **326 IAC 8-3-2 (Cold Cleaning Operations)**

Any degreaser using VOC containing solvents is considered a cold cleaning operation. The parts cleaning stations at this source were constructed after January 1, 1980 and are subject to 326 IAC 8-3-2. Pursuant to 326 IAC 8-3-2, for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### **326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)**

The parts cleaning stations, which use VOC containing solvents, were constructed after July 1, 1990 and do not have remote solvent reservoirs. Therefore, the parts cleaning stations at this source are subject to 326 IAC 8-3-5 and must be operated in compliance with the following requirements:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1,

1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### **State Rule Applicability – Natural Gas Fired Heaters and the Back-up Generator**

There are no specifically applicable requirements for these units.

#### **Conclusion**

The operation of this printing facility shall be subject to the conditions of the Minor Source Operating Permit 141-19482-00179.

**Appendix A: Emissions Calculations**  
**VOC Emissions from Non-Heatset Printing Presses M 130-01, M 130-2, and V 30**

**Company Name: Bowne of South Bend**  
**Address: 5021 Nimitz Parkway, South Bend, IN 46628**  
**MSOP #: 141-19482-00179**  
**Reviewer: ERG/YC**  
**Date: March 11, 2005**

Printing presses M 130-01, M 130-02, and V 30 have identical capacities and the potential to emit VOC from each of these presses is calculated as follows:

Throughput	Press I.D.	Max. Line Speed (ft/min)	Max. Print Width (inches)	Max. Operating Hours (hr/yr)	MMin <sup>2</sup> /yr
	M 130-01	1,422	38	8,760	340,816

PTE of VOC	Material Name	Maximum Coverage (gal/MMin <sup>2</sup> )	VOC Content* (lbs/gal)	Flash Off %**	Throughput (MMin <sup>2</sup> /yr)	Emissions (tons/yr)
	Inks	2.12E-01	0.23	5.00%	340,816	4.15E-01
	Fountain Solutions	1.98E-03	3.10	100%	340,816	1.05E+00
	Cleaning Agents	2.58E-03	6.82	100%	340,816	2.99E+00
	Photo Chemicals	3.67E-03	1.75	100%	340,816	1.09E+00
	Coatings	5.68E-03	0.05	100%	340,816	4.84E-02
	Misc Materials	3.37E-04	7.28	100%	340,816	4.18E-01

\* This is the worst case material for each category.

\*\* According to EPA Document PB95-201422, the flash off % for the inks used for non-heatset printing presses is 5% (09/93).

**Total VOC Emissions =**

<b>6.01</b>
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Tons/yr

**METHODOLOGY**

Throughput (MMin<sup>2</sup>/yr) = Max. Line Speed (ft/min) x 12 in/ft x Max. Print Width (inches) x 60 min/hr x Max. Operating Hours (hr/yr) x 1 MMin<sup>2</sup>/1,000,000 in<sup>2</sup>  
PTE of VOC (tons/yr) = Max. Coverage (gal/MMin<sup>2</sup>) x Throughput (MMin<sup>2</sup>/yr) x VOC Content (lbs/gal) x Flash Off % x 1 ton/2000 lbs

**Appendix A: Emissions Calculations**  
**VOC Emissions from Non-Heatset Printing Press V 25**

**Company Name: Bowne of South Bend**  
**Address: 5021 Nimitz Parkway, South Bend, IN 46628**  
**MSOP #: 141-19482-00179**  
**Reviewer: ERG/YC**  
**Date: March 11, 2005**

Throughput				
Press I.D.	Max. Line Speed (ft/min)	Max. Print Width (inches)	Max. Operating Hours (hr/yr)	MMin <sup>2</sup> /yr
V 25	1,000	38	8,760	239,674

PTE of VOC					
Material Name*	Maximum Coverage (gal/MMin <sup>2</sup> )	VOC Content* (lbs/gal)	Flash Off %**	Throughput (MMin <sup>2</sup> /yr)	Emissions (tons/yr)
Inks	2.11E-01	0.23	5.00%	239,674	2.91E-01
Fountain Solutions	1.98E-03	3.10	100%	239,674	7.35E-01
Cleaning Agents	2.57E-03	6.82	100%	239,674	2.10E+00
Photo Chemicals	3.66E-03	1.75	100%	239,674	7.69E-01
Coatings	5.67E-03	0.05	100%	239,674	3.40E-02
Misc Materials	3.37E-04	7.28	100%	239,674	2.94E-01

\* This is the worst case material for each category.

\*\* According to EPA Document PB95-201422, the flash off % for the inks used for non-heatset printing presses is 5% (09/93).

**Total VOC Emissions =** **4.23**  
**Tons/yr**

**METHODOLOGY**

Throughput (MMin<sup>2</sup>/yr) = Max. Line Speed (ft/min) x 12 in/ft x Max. Print Width (inches) x 60 min/hr x Max. Operating Hours (hr/yr) x 1 MMin<sup>2</sup>/1,000,000 in<sup>2</sup>

PTE of VOC (tons/yr) = Max. Coverage (gal/MMin<sup>2</sup>) x Throughput (MMin<sup>2</sup>/yr) x VOC Content (lbs/gal) x Flash Off % x 1 ton/2000 lbs

**Appendix A: Emissions Calculations**  
**VOC Emissions from Non-Heatset Sheet Fed Printing Press - Mitsubishi**

**Company Name: Bowne of South Bend**  
**Address: 5021 Nimitz Parkway, South Bend, IN 46628**  
**MSOP #: 141-19482-00179**  
**Reviewer: ERG/YC**  
**Date: March 11, 2005**

Throughput				
Max. Line Speed (sheet/hr)	Max. Print Width (inches)	Max. Print Length (inches)	Max. Operating Hours (hr/yr)	MMin <sup>2</sup> /yr
13,000	40	28	8,760	127,546

PTE of VOC					
Material Name*	Maximum Coverage (gal/MMin <sup>2</sup> )	VOC Content* (lbs/gal)	Flash Off %**	Throughput (MMin <sup>2</sup> /yr)	Emissions (tons/yr)
Inks	2.11E-01	0.23	5.00%	127,546	1.55E-01
Fountain Solutions	1.98E-03	3.10	100%	127,546	3.91E-01
Cleaning Agents	2.59E-03	6.82	100%	127,546	1.13E+00
Photo Chemicals	3.66E-03	1.75	100%	127,546	4.09E-01
Coatings	5.67E-03	0.05	100%	127,546	1.81E-02
Misc Materials	3.37E-04	7.28	100%	127,546	1.57E-01

\* This is the worst case material for each category.

\*\* According to EPA Document PB95-201422, the flash off % for the inks used for non-heatset printing presses is 5% (09/93).

**Total VOC Emissions =**

<b>2.26</b>
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Tons/yr

**METHODOLOGY**

Throughput (MMin<sup>2</sup>/yr) = Max. Line Speed (sheet/hr) x Max. Print Width (inches) x Max. Print Length (inches) x Max. Operating Hours (hr/yr) x 1 MMin<sup>2</sup>/1,000,000 in<sup>2</sup>

PTE of VOC (tons/yr) = Max. Coverage (gal/MMin<sup>2</sup>) x Throughput (MMin<sup>2</sup>/yr) x VOC Content (lbs/gal) x Flash Off % x 1 ton/2000 lbs

**Appendix A: Emissions Calculations**  
**VOC Emissions from Non-Heatset Sheet Fed Printing Press - Miller**

**Company Name:** Bowne of South Bend  
**Address:** 5021 Nimitz Parkway, South Bend, IN 46628  
**MSOP #:** 141-19482-00179  
**Reviewer:** ERG/YC  
**Date:** March 11, 2005

Throughput				
Max. Line Speed (sheet/hr)	Max. Print Width (inches)	Max. Print Length (inches)	Max. Operating Hours (hr/yr)	MMin <sup>2</sup> /yr
10,000	35	23	8,760	70,518

PTE of VOC					
Material Name*	Maximum Coverage (gal/MMin <sup>2</sup> )	VOC Content* (lbs/gal)	Flash Off %**	Throughput (MMin <sup>2</sup> /yr)	Emissions (tons/yr)
Inks	2.11E-01	0.23	5.00%	70,518	8.57E-02
Fountain Solutions	1.98E-03	3.10	100%	70,518	2.16E-01
Cleaning Agents	2.59E-03	6.82	100%	70,518	6.24E-01
Photo Chemicals	3.66E-03	1.75	100%	70,518	2.26E-01
Coatings	5.67E-03	0.05	100%	70,518	1.00E-02
Misc Materials	3.37E-04	7.28	100%	70,518	8.65E-02

\* This is the worst case material for each category.

\*\* According to EPA Document PB95-201422, the flash off % for the inks used for non-heatset printing presses is 5% (09/93).

**Total VOC Emissions =**

<b>1.25</b>
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Tons/yr

**METHODOLOGY**

Throughput (MMin<sup>2</sup>/yr) = Max. Line Speed (sheet/hr) x Max. Print Width (inches) x Max. Print Length (inches) x Max. Operating Hours (hr/yr) x 1 MMin<sup>2</sup>/1,000,000 in<sup>2</sup>

PTE of VOC (tons/yr) = Max. Coverage (gal/MMin<sup>2</sup>) x Throughput (MMin<sup>2</sup>/yr) x VOC Content (lbs/gal) x Flash Off % x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
PM/PM10 Emissions  
From the Paper Cutting Operation**

**Company Name:** Bowne of South Bend  
**Address:** 5021 Nimitz Parkway, South Bend, IN 46628  
**MSOP #:** 141-19482-00179  
**Reviewer:** ERG/YC  
**Date:** March 11, 2005

**1. Process Description:**

Maximum Total Throughput: 1,850 lbs/hr  
PM/PM10 Emission Factor: 0.05% by weight (provided by the source)

**2. Potential to Emit PM/PM10:**

**Hourly PM/PM10 Emissions** = 1850 lbs/hr x 0.05% = **0.93 lbs/hr**  
**Annual PM/PM10 emissions** = 0.93 lbs/hr x 8760 hr/yr x 1 ton/2000 lbs = **4.05 tons/yr**

**Appendix A: Emission Calculations**  
**VOC Emissions**  
**From the Two (2) Parts Cleaning Stations**

**Company Name: Bowne of South Bend**  
**Address: 5021 Nimitz Parkway, South Bend, IN 46628**  
**MSOP: 141-19482-00179**  
**Reviewer: ERG/YC**  
**Date: March 11, 2005**

Solvent Used*	Density (lbs/gal)	Max. Usage (gal/yr)	Weight % VOC	PTE of VOC (tons/yr)
Stoddard Solvent	6.7	290	100%	0.97
<b>Total</b>				<b>0.97</b>

\* This is the worst case solvent and it does not contain any regulated HAP.

**METHODOLOGY**

PTE of VOC (tons/yr) = Density (lbs/gal) x Max. Usage (gal/yr) x Weight % VOC x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Natural Gas Combustion  
(MMBtu/hr < 100)  
From Thirty-One (31) Natural Gas Fired Space Heaters**

**Company Name: Bowne of South Bend**  
**Address: 5021 Nimitz Parkway, South Bend, IN 46628**  
**MSOP: 141-19482-00179**  
**Reviewer: ERG/YC**  
**Date: March 11, 2005**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

11.7 (31 units combined)

102.5

Emission Factor in lbs/MMCF	Pollutant					
	PM*	PM10*	SO <sub>2</sub>	**NO <sub>x</sub>	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
<b>Potential to Emit in tons/yr</b>	<b>0.39</b>	<b>0.39</b>	<b>0.03</b>	<b>5.12</b>	<b>0.28</b>	<b>4.30</b>

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

\*\*Emission factor for Nox: uncontrolled = 100 lbs/MMCF.

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

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

Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Natural Gas Combustion  
Emissions from the Back-Up NG Fired Generator**

**Company Name:** Bowne of South Bend  
**Address:** 5021 Nimitz Parkway, South Bend, IN 46628  
**MSOP:** 141-19482-00179  
**Reviewer:** ERG/YC  
**Date:** March 11, 2005

Heat Input Capacity  
MMBtu/hr

0.92

Operation Limit  
hr/yr

500

Emission Factor in lb/MMBtu	Pollutant					
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub> *	VOC	CO*
	9.91E-03	3.84E-02	5.88E-04	3.17E+00	1.20E-01	3.86E-01
<b>Potential to Emit before Control in tons/yr</b>	<b>2.28E-03</b>	<b>8.83E-03</b>	<b>1.35E-04</b>	<b>0.73</b>	<b>0.03</b>	<b>0.09</b>

Emission factors are from AP-42, Chapter 3.2, Table 3.2-1: Uncontrolled Emission Factors for 2-Stroke Lean-Burn Engines (AP-42, 07/00).

\*NO<sub>x</sub> and CO emission factors are the emission factors for 90-105% load.

Note: As defined in the September 6, 1995 memorandum from John S. Seitz of US EPA on the subject of "Calculating Potential to Emit for Emergency Generators", an emergency generator's sole function is to provide back-up power when power from the local utility is interrupted. The only circumstances under which an emergency generator would operate when utility power is available are during operator training or brief maintenance checks. The generator's potential to emit is based on an operating time of 500 hours per year as set forth in the EPA memo.

**Methodology**

Emission (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x Operation Limit (hr/yr) x 1 ton/2000 lbs