



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 30, 2007
RE: Courier Kendallville, INC. / 113-20736-00021
FROM: Nisha Sizemore
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 03/23/06



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

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

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

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

Operation Permit No.: F 113-20736-00021	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: May 30, 2007 Expiration Date: May 30, 2012

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
SECTION B	GENERAL CONDITIONS	8
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Severability [326 IAC 2-8-4(4)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.9	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12	Emergency Provisions [326 IAC 2-8-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]	
B.20	Source Modification Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10] [IC 13-17-3-2]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	17
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.9	Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

Stratospheric Ozone Protection

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

SECTION D.1 FACILITY OPERATION CONDITIONS: Printing Presses..... 24

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

- D.1.1 FESOP Limits [326 IAC 2-8-4]
- D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
- D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]
- D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.7 VOC Emissions

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

- D.1.8 Thermal Oxidizer Temperature
- D.1.9 Parametric Monitoring

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

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

Certification 31

Emergency Occurrence Report 32

Quarterly Reports 34 - 37

Quarterly Deviation and Compliance Monitoring Report 38

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a commercial printing source.

Source Address:	2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address:	2500 Marion Drive, Kendallville, Indiana 46755
General Source Phone Number:	978 - 251 - 6256
SIC Code:	2752
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, installed after 1980, with a maximum line speed of 1,265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, exhausting to one (1) stack, identified as 6, each with a maximum heat input rate of 2.93 million British thermal units per hour.
- (b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, installed after 1980, with a maximum line speed of 1,600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, each with a maximum heat input rate of 4.4 million British thermal units per hour.
- (c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, installed after 1980, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, exhausting to one (1) stack, identified as 2, each with a maximum heat input rate of 2.56 million British thermal units per hour.
- (d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, installed after 1980, with a maximum line speed of 1,264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, each with a maximum

heat input rate of 4.0 million British thermal units per hour.

- (e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, installed after 1980, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches.
- (f) One (1) sheetfed UV Coater, installed after 1980, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches.
- (g) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, installed in 2004, exhausting through stacks one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum heat input rate of 10.5 million British thermal units per hour.
- (h) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 2, installed in 2005, exhausting through stacks one (1) of two (2) Oxy 1 or Oxy 2, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 2 dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum heat input rate of 10.5 million British thermal units per hour.
- (i) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 3, installed in 2006, exhausting through stack TNV 1, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 3 dryer, exhausting to one (1) stack, identified as TNV 1, with a maximum heat input rate of 10.5 million British thermal units per hour.
- (j) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 2, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of 1,600°F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.
- (k) One (1) regenerative thermal oxidizer, identified as Cleanswitch 2, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 1, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of 1,600°F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.
- (l) One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 1, exhausting to one (1) stack, identified as TNV 1, with a maximum heat input rate of 5.31 million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 20 parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 3 printing press.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour:

- (1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of 0.20 million British thermal units per hour;
 - (2) Three (3) natural gas-fired air make-up units, two (2) with a maximum heat input rate of 0.18 million British thermal units per hour, each, and one (1) with a maximum heat input capacity of 0.15 million British thermal units per hour;
 - (3) One (1) natural gas fired space heater, with a maximum heat input capacity of 0.25 million British thermal units per hour;
 - (4) Nineteen (19) natural gas fired HVAC units, seventeen (17) with a maximum heat input rating of 0.400 million British thermal units per hour, each, one (1) with a maximum heat input rating of 0.350 million British thermal units per hour, and one (1) with a maximum heat input capacity of 0.125 million British thermal units per hour;
 - (5) One (1) natural gas fired space heater with a rating of 0.075 million British thermal units per hour.
- (b) The following VOC storage containers:
- (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (c) Cleaners and solvents characterized as follows:
- (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (g) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (i) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
- (1) The cleaning solvent used on the UV coater;
 - (2) One (1) film cleaner used in the plating room;

- (j) Other activities or categories not previously identified:
- (1) Five (5) binding operations, identified as Fox Stitcher, Norm Binder, Kolbus Binder, Corona, and Kolbus K-2, each with a maximum capacity of 560 pounds of paper waste per hour;
 - (2) Film processor used to develop black and white film; and
 - (3) Five (5) plate processors used to develop printing plates;
 - (4) Two (2) casemakers, identified as Kolbus DA-36;
 - (5) Two (2) tippers, identified as Hunkeler VEA; and
 - (6) Eight (8) electric plate processing ovens.

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

- (a) This permit, 113-20736-00021, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

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

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) 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.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than

one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 113-20736-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent.

A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

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

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

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.
[326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOPsource is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect ,at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10 (b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [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 one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

monitor) in a six (6) hour period.

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

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

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

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

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

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

C.7 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ, approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ, that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ, may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) 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.

Stratospheric Ozone Protection

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

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

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

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, installed after 1980, with a maximum line speed of 1,265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, exhausting to one (1) stack, identified as 6, each with a maximum heat input rate of 2.93 million British thermal units per hour.
- (b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, installed after 1980, with a maximum line speed of 1,600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, each with a maximum heat input rate of 4.4 million British thermal units per hour.
- (c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, installed after 1980, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, exhausting to one (1) stack, identified as 2, each with a maximum heat input rate of 2.56 million British thermal units per hour.
- (d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, installed after 1980, with a maximum line speed of 1,264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, each with a maximum heat input rate of 4.0 million British thermal units per hour.
- (e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, installed after 1980, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches.
- (f) One (1) sheetfed UV Coater, installed after 1980, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches.
- (g) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, installed in 2004, exhausting through stacks one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum heat input rate of 10.5 million British thermal units per hour.
- (h) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 2, installed in 2005, exhausting through stacks one (1) of two (2) Oxy 1 or Oxy 2, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 2 dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum heat input rate of 10.5 million British thermal units per hour.

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

- (i) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 3, installed in 2006, exhausting through stack TNV 1, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 3 dryer, exhausting to one (1) stack, identified as TNV 1, with a maximum heat input rate of 10.5 million British thermal units per hour.
- (j) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 2, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of 1,600°F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.
- (k) One (1) regenerative thermal oxidizer, identified as Cleanswitch 2, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 1, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of 1,600°F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.
- (l) One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 1, exhausting to one (1) stack, identified as TNV 1, with a maximum heat input rate of 5.31 million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 20 parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 3 printing press.

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

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

D.1.1 FESOP Limits [326 IAC 2-8-4]

- (a) VOC emissions from the printing presses, identified Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press, shall be limited to less than a total of ninety-two (92.0) tons per tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The VOC emissions calculated shall be the sum of each individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 93). The control efficiencies to be used for each thermal oxidizer shall be obtained from the most recent valid test. Either the thermal oxidizer Cleanswitch or Cleanswitch 2 shall be operated at any one (1) time. Compliance with this limit will be demonstrated by using the following equation:

Presses with a thermal oxidizer
$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Presses without a thermal oxidizer
$$E_n = U_n \times V_n \times F$$

Total VOC Emissions from all presses
$$E_t = E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

n = Each printing press
t = Total printing presses
Et = VOC emissions from all presses
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
Cn = Capture efficiency for each thermal oxidizer from each press
Dn = Destruction efficiency for each oxidizer from each press(Oxidizer control efficiency)

- (b) The combination of HAP emissions from the heat set web offset lithographic printing presses, identified as Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press, shall be limited to a total of less than 8.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This combination HAP limit shall ensure the worst case single HAP emissions are less than ten (10) tons per year. The HAP emissions calculated shall be the sum of each individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 93). The control efficiencies to be used for each thermal oxidizer shall be obtained from the most recent valid test. Either the thermal oxidizer Cleanswitch or Cleanswitch 2 shall be operated at any one (1) time. Compliance with this limit shall be demonstrated by using the following equation:

Presses with thermal oxidizer

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

Presses without thermal oxidizer

$$E_n = U_n \times H_n \times F$$

Total HAP Emissions from all presses

$$E_t = E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

n = Each printing press
t = Total printing presses
Et = HAP emissions from all presses
En = HAP emissions from all presses
Un = Total usage of each material from all presses
Hn = Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs from all presses
F = Flash off factor of each material from all presses
Cn = Capture efficiency for each thermal oxidizer from each press
Dn = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

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

- (a) Pursuant to 326 IAC 8-1-6 and SPR 113-17840-00021, issued on January 6, 2004, the BACT for the printing presses, identified as Lithoman, M130, and M850 has been determined to be the use of one (1) of the regenerative thermal oxidizers, identified as Cleanswitch 2 or

Cleanswitch, at all times the presses are in operation.

- (b) Pursuant to 326 IAC 8-1-6 and SPR 113-20307-00021, issued on May 27, 2005, the BACT for the one (1) heat set web offset lithographic printing press, identified as Lithoman 2, has been determined to be:
- (1) The exhaust shall be vented to one of the two (2) regenerative thermal oxidizers (Cleanswitch or Cleanswitch 2) with a minimum of 97% destruction efficiency for VOC;
 - (2) The VOC content of the fountain solution shall be no greater than 3% VOC as applied;
 - (3) The blanket and roller washes shall have a vapor pressure no greater than 10 mm Hg at 20°C or the VOC content shall be limited to 2.5 lb/gal as applied; and
 - (4) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94):
 - (A) 100 percent (100%) capture, by weight, of the VOC in press ready inks;
 - (B) 70 percent (70%) capture, by weight, of the VOC in press ready fountain solutions; and
 - (C) 40 percent (40%) capture, by weight, of the VOC in press ready automatic cleaning solvents.
- (c) Pursuant to 326 IAC 8-1-6 and SPR 113-23204-00021 issued on November 13, 2006, the BACT for the one (1) heat set web offset lithographic printing press, identified as Lithoman 3, has been determined to be:
- (1) The exhaust shall be vented to the one (1) integrated recuperative thermal oxidizer, identified as TNV 1, with a minimum of ninety-eight percent (98%) destruction efficiency for VOC as demonstrated by achieving a VOC outlet concentration of twenty (20) ppmv or less as hexane, minus methane and ethane;
 - (2) The VOC content of the fountain solution shall be no greater than three percent (3%) VOC as applied;
 - (3) The blanket and roller washes shall have a vapor pressure no greater than ten (10) mm Hg at 20°C or the VOC content shall be limited to two and one-half (2.5) pounds per gallon as applied; and
 - (4) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 93):
 - (A) 100 percent (100%) capture, by weight, of the VOC in press ready inks;
 - (B) 70 percent (70%) capture, by weight, of the VOC in press ready fountain solutions; and
 - (C) 40 percent (40%) capture, by weight, of the VOC in press ready automatic cleaning solvents.

- (d) The VOC emissions from the printing presses, identified as Mark 16 and Mark 6, shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with these limits shall render the requirements of 326 IAC 8-1-6 not applicable.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the printing presses and their control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) The Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, utilizing methods as approved by the Commissioner. This test shall be performed by November 28, 2011 which is five (5) years from the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).
- (b) The Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch, utilizing methods as approved by the Commissioner. This test shall be performed by December 1, 2009, which is five (5) years from the date of the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).
- (c) Within one hundred eighty (180) days after initial startup, which is by June 1, 2007, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) integrated recuperative thermal oxidizer, identified as TNV 1, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).

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

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizers at all times the lithographic printing presses, identified as Lithoman 3, M130, M850, Lithoman and Lithoman 2 are in operation.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the ink, coating, fountain solution and cleaning solvent manufacturers. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

- (a) At least one (1) regenerative thermal oxidizer, identified as Cleanswitch 2 or Cleanswitch, shall be in operation at all times when the printing presses M850, M130, Lithoman, and/or Lithoman 2 are in operation.
- (b) The integrated recuperative thermal oxidizer, identified as TNV 1, shall be in operation at all times when the printing press Lithoman 3 is in operation.

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

D.1.8 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers, identified as Cleanswitch, Cleanswitch 2, and TNV 1, at or above the three (3) hour average temperatures of 1,600°F, 1,600°F, and 1,400°F, respectively.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.

D.1.9 Parametric Monitoring

- (a) The Permittee shall maintain a negative air flow pressure for the press dryers relative to the surrounding room as indicated by differential pressure gauges across the dryer inlets and outlets.
- (b) To demonstrate that a negative air flow pressure is achieved, the Permittee shall install differential pressure gauges at each of the dryer inlets and outlets, and measure and record the differential pressure across the inlets and outlets of the press dryers at least once per day.
- (c) Maintaining a negative air flow pressure across the dryer inlets and outlets shall yield the following capture efficiencies:
 - (1) 100 percent (100%) capture, by weight, of the VOC in press ready inks;
 - (2) 70 percent (70%) capture, by weight, of the VOC in press ready fountain solutions; and
 - (3) 40 percent (40%) capture, by weight, of the VOC in press ready automatic cleaning solvents.

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

D.1.10 Record Keeping Requirements

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

- (3) The weight of VOCs and HAPs emitted for each compliance period, considering capture and destruction (or removal) efficiency.
 - (4) Operational parameters of the VOC and HAP emission control equipment, considering capture and destruction (or removal) efficiency.
 - (5) Operational parameters of the VOC and HAP emission control equipment, such as:
 - (A) Data used to establish the capture and destruction (or removal) efficiencies at the time of the initial compliance test; and
 - (B) Temperature readings.
- (b) To document compliance with Condition D.1.2(d), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2(d).
- (1) The amount and VOC content of each ink, fountain solution, coating material and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to inks and fountain solutions and those used as cleanup solvents. Alternatively, the ink, fountain solution or cleaning solvent with the highest VOC and HAP content may be used to represent all inks, fountain solutions or cleaning solvents used by the offset lithographic printing presses;
 - (2) A monthly log of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records of the differential pressure across the dryer inlets and outlets as specified in Condition D.1.9.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

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

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

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

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
Permit No.: F 113-20736-00021

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
Permit No.: F 113-20736-00021

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|---|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
Permit No.: F 113-20736-00021
Facility: One (1) heat set web offset lithographic printing press, identified as Mark 16
Parameter: VOC emissions
Limit: VOC emissions shall not exceed twenty-five (25) tons per year

YEAR: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
Permit No.: F 113-20736-00021
Facility: One (1) heat set web offset lithographic printing press, identified as Mark 6
Parameter: VOC emissions
Limit: VOC emissions shall not exceed twenty-five (25) tons per year

YEAR: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
 Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
 Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
 Permit No.: F 113-20736-00021
 Facilities: Eight (8) printing presses (Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press)
 Parameter: VOC Emissions
 Limit: 92.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
 Compliance shall be shown using the following equation:
 Presses with a thermal oxidizer

$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$
 Presses without a thermal oxidizer

$$E_n = U_n \times V_n \times F$$
 Total VOC emissions from all presses

$$E_t = E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

- n = Each printing press
- t = Total printing presses
- E_t = Total VOC emissions from all presses
- E_n = VOC emissions from each press
- U_n = Total usage of each material from each press
- V_n = VOC content of each material from each press
- F = Flash off factor of each material from each press
- C_n = Capture efficiency for each thermal oxidizer from each press
- D_n = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

YEAR: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 Deviation has been reported on _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
 Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
 Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
 Permit No.: F 113-20736-00021
 Facilities: Eight (8) printing presses (Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press)
 Parameter: Total HAP Emissions
 Limit: Less than 8.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:
 Presses with a thermal oxidizer

$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$
 Presses without a thermal oxidizer

$$E_n = U_n \times V_n \times F$$
 Total VOC emissions from all presses

$$E_t = E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

- n = Each printing press
- t = Total printing presses
- E_t = Total VOC emissions from all presses
- E_n = VOC emissions from each press
- U_n = Total usage of each material from each press
- V_n = VOC content of each material from each press
- F = Flash off factor of each material from each press
- C_n = Capture efficiency for each thermal oxidizer from each press
- D_n = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

YEAR: _____

Month	HAP Emissions (tons)	HAP Emissions (tons)	HAP Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
Permit No.: F 113-20736-00021

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period@."</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)
Renewal

Source Name: Courier Kendallville, Inc.
Source Location: 2500 Marion Drive, Kendallville, Indiana 46755
County: Noble
FESOP: F 113-20736-00021
SIC Code: 2752
Permit Reviewer: Brian J. Pedersen/MES

On April 20, 2007, the Office of Air Quality (OAQ) had a notice published in the News-Sun, Kendallville, Indiana, stating that Courier Kendallville, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a commercial printing source with thermal oxidizers used for control. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

IDEM, OAQ has added mail codes to the addresses listed in the permit for the following: Permit Branch; Compliance Branch; Compliance Data Section; Technical Support and Modeling; and Asbestos Section.

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

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

Source Background and Description

Source Name:	Courier Kendallville, Inc.
Source Location:	2500 Marion Drive, Kendallville, Indiana 46755
County:	Noble
SIC Code:	2752
Operation Permit No.:	F 113-12093-00021
Operation Permit Issuance Date:	October 13, 2000
Permit Renewal No.:	F 113-20736-00021
Permit Reviewer:	Brian J. Pedersen

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Courier Kendallville, Inc. relating to the operation of a stationary commercial printing source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, installed after 1980, with a maximum line speed of 1,265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, exhausting to one (1) stack, identified as 6, each with a maximum heat input rate of 2.93 million British thermal units per hour.
- (b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, installed after 1980, with a maximum line speed of 1,600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, each with a maximum heat input rate of 4.4 million British thermal units per hour.
- (c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, installed after 1980, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, exhausting to one (1) stack, identified as 2, each with a maximum heat input rate of 2.56 million British thermal units per hour.
- (d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, installed after 1980, with a maximum line speed of 1,264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, each with a maximum heat input rate of 4.0 million British thermal units per hour.

- (e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, installed after 1980, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches.
- (f) One (1) sheetfed UV Coater, installed after 1980, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches.
- (g) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, installed in 2004, exhausting through stacks one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum heat input rate of 10.5 million British thermal units per hour.
- (h) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 2, installed in 2005, exhausting through stacks one (1) of two (2) Oxy 1 or Oxy 2, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 2 dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum heat input rate of 10.5 million British thermal units per hour.
- (i) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 3, installed in 2006, exhausting through stack TNV 1, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 3 dryer, exhausting to one (1) stack, identified as TNV 1, with a maximum heat input rate of 10.5 million British thermal units per hour.
- (j) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 2, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of 1,600°F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.
- (k) One (1) regenerative thermal oxidizer, identified as Cleanswitch 2, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 1, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of 1,600°F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.
- (l) One (1) natural gas-fired integrated recuperative thermal oxidizer, identified as TNV 1, exhausting to one (1) stack, identified as TNV 1, with a maximum heat input rate of 5.31 million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 20 parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 3 printing press.

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 Receiving Advanced Source Modification Approval

There are no proposed emission units during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of:
 - (1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of 0.20 million British thermal units per hour;
 - (2) Three (3) natural gas-fired air make-up units, two (2) with a maximum heat input rate of 0.18 million British thermal units per hour, each, and one (1) with a maximum heat input capacity of 0.15 million British thermal units per hour;
 - (3) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 million British thermal units per hour;
 - (4) Nineteen (19) natural gas-fired HVAC units, seventeen (17) with a maximum heat input rating of 0.400 million British thermal units per hour, each, one (1) with a maximum heat input rating of 0.350 million British thermal units per hour, and one (1) with a maximum heat input capacity of 0.125 million British thermal units per hour;
 - (5) One (1) natural gas-fired space heater with a rating of 0.075 million British thermal units per hour.
- (b) The following VOC storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (c) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (g) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (i) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
 - (1) The cleaning solvent used on the UV coater;
 - (2) One (1) film cleaner used in the plating room;
- (j) Other activities or categories not previously identified:
 - (1) Five (5) binding operations, identified as Fox Stitcher, Norm Binder, Kolbus Binder, Corona, and Kolbus K-2, each with a maximum capacity of 560 pounds of paper waste per hour;
 - (2) Film processor used to develop black and white film; and
 - (3) Five (5) plate processors used to develop printing plates;
 - (4) Two (2) casemakers, identified as Kolbus DA-36;
 - (5) Two (2) tippers, identified as Hunkeler VEA; and
 - (6) Eight (8) electric plate processing ovens.

Existing Approvals

The source has been operating under the previous FESOP 013-12093-00021 issued on October 13, 2000 and the following amendments and revisions:

- (a) AA 113-16645-00021 issued on November 4, 2002;
- (b) MPR 113-16834-00021 issued on May 12, 2003;
- (c) SPR 113-17840-00021 issued on January 6, 2004;
- (d) SPR 113-20307-00021 issued on May 27, 2005; and
- (e) SPR 113-23204-00021 issued on November 13, 2006.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP renewal application for the purposes of this review was received on February 10, 2005. Additional information was received on October 24 and October 26, 2006.

Emission Calculations

See pages 1 through 12 of Appendix A of this document for detailed emission calculations

Unrestricted Potential Emissions

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

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	0.628
PM ₁₀	2.51
SO ₂	0.198
VOC	2,432
CO	27.8
NO _x	33.1

HAPs	Unrestricted Potential Emissions (tons/yr)
Glycol Ethers	32.4
Total	45.3

The total HAP emissions are based on emissions from the presses, the insignificant combustion and binding operations.

Potential to Emit After Issuance

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

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Printing Presses: Mark 6, Mark 16, M130, M850, Heidelberg Sheetfed, Lithoman, Lithoman 2, and Lithoman 3	-	-	-	¹ Limited to less than 92	-	-	Single less than 8.7 Total less than 23.7
Insignificant Activities	³ 2.63	³ 4.51	0.198	² 7.38	27.8	33.1	⁴ 1.18
Total Emissions	2.63	4.51	0.198	Less than 100	27.8	33.1	Single less than 10 Total less than 25

- ¹ This limit has been adjusted to take into account VOC emissions from all insignificant activities.
- ² A conservative estimate of five (5) tons of VOC per year has been added to insignificant activities for noncombustion emission units.
- ³ A conservative estimate of two (2) tons of PM/PM₁₀ per year has been added to insignificant activities for welding and cutting operations.
- ⁴ The HAP emissions, which are negligible for the insignificant welding operation, have been added to the insignificant activities.

County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM _{2.5}	Attainment
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-Hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 which redesignated Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignated Lake County to attainment for the sulfur dioxide standard, and revoked the one-hour ozone standard in Indiana.

- (b) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (c) Noble 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 a surrogate for PM_{2.5} emissions. See the State Rule Applicability for the source section.
- (d) Noble County has been classified as attainment or unclassifiable in Indiana for all 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 - Entire Source section of this document.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	2.63
PM ₁₀	4.51
SO ₂	0.198
VOC	Less than 100
CO	27.8
NO _x	33.1
Single HAP	Less than 10
Combination HAPs	Less than 25

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or greater, it is not in one of the twenty-eight (28) listed source categories and the worst case single HAP emissions are less than ten (10) tons per year and the combined HAP emissions are less than twenty-five (25) tons per year.
- (b) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Federal Rule Applicability

- (a) The provisions of the New Source Performance Standard for Graphic Arts Industry: Publication Rotogravure Printing, 326 IAC 12, (40 CFR 60, Subpart QQ), are not included in this permit because these printing presses are not publication rotogravure printing presses.
- (b) There are no other New Source Performance Standards included in the permit for this source.
- (c) The provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, Subpart KK (Printing and Publishing Industry) are not included in this permit because the printing presses are not publication rotogravure, packaging rotogravure or wide-web flexographic printing presses.
- (d) The potential to emit of a single Hazardous Air Pollutant (HAP) is limited to less than ten (10) tons per year and the potential to emit of combined Hazardous Air Pollutants (HAPs) is limited to less than twenty-five (25) tons per year. Therefore, this source is a minor source of Hazardous Air Pollutants (HAPs) and the provisions of 40 CFR 63, Subpart JJJJ (Paper and Other Web Coating), are not included in this permit.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit for this source.

State Rule Applicability – Entire Source

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

Source wide VOC emissions are limited to less than one hundred (100) tons per year so that this source will not be subject to Part 70 rules. All remaining criteria pollutants have the potential to emit of less than two hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source under 326 IAC 2-2 (PSD).

326 IAC 2-4.1-1 (New source toxics control)

The operation of this stationary commercial printing source will limit HAP emissions to less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-8-4 (FESOP)

- (a) The VOC emissions from the printing presses, identified as Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press shall be limited to less than 92.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This ensures that VOC emissions from the entire source are less than one hundred (100) tons per year, including VOC emissions from natural gas combustion. The VOC emissions calculated shall be the sum of each individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 93). The control efficiencies to be used for each thermal oxidizer shall be obtained from the most recent valid test. Either thermal oxidizer Cleanswitch or Cleanswitch 2 shall be operated at any one (1) time.

Compliance with this limit will be demonstrated by using the following equation:

Presses with a thermal oxidizer

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

Presses without a thermal oxidizer

$$E_n = U_n \times V_n \times F$$

Total VOC emissions from all presses

$$E_t = E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

n = Each printing press

t = Total printing presses

E_t = Total VOC emissions from all presses

E_n = VOC emissions from each press

U_n = Total usage of each material from each press

V_n = VOC content of each material from each press

F = Flash off factor of each material from each press

C_n = Capture efficiency for each thermal oxidizer from each press

D_n = Destruction efficiency for each thermal oxidizer from each press
(Oxidizer control efficiency)

- (b) The combination HAP emissions from the heat set web offset lithographic printing presses, identified as Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman, Lithoman 2, and the Heidelberg Sheetfed Press shall be limited to a total of less than 8.7 tons per year, per twelve (12) consecutive month period with compliance determined at the end of each month. This combination HAP limit shall ensure the worst case single HAP emissions are less than ten (10) tons per year. This limit was established to take into account the potential to emit of HAPs for all combustion units. The HAP emissions calculated shall be the sum of each individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic

Printing" (EPA September 93). The control efficiencies to be used for each thermal oxidizer shall be obtained from the most recent valid test. Either thermal oxidizer Cleanswitch or Cleanswitch 2 shall be operated at any one (1) time.

Compliance with this limit will be demonstrated by using the following equation:

Presses with a thermal oxidizer
$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Presses without a thermal oxidizer
$$E_n = U_n \times V_n \times F$$

Total VOC emissions from all presses
$$E_t = E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

- n = Each printing press
- t = Total printing presses
- E_t = Total VOC emissions from all presses
- E_n = VOC emissions from each press
- U_n = Total usage of each material from each press
- V_n = VOC content of each material from each press
- F = Flash off factor of each material from each press
- C_n = Capture efficiency for each thermal oxidizer from each press
- D_n = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

State Rule Applicability – Individual Facilities

326 IAC 8-1-6 (New facilities; general reduction requirements)

The printing presses, identified as Lithoman, Lithoman 2 and Lithoman 3, are subject to the requirements of 326 IAC 8-1-6 because the VOC emissions from these presses are greater than twenty-five (25) tons per year, each, and they were constructed after January 1, 1980.

- (a) Pursuant to 326 IAC 8-1-6 and SPR 113-17840-00021, issued on January 6, 2004, the BACT for the printing presses, identified as Lithoman, M130, and M850 has been determined to be the use of one (1) of the regenerative thermal oxidizers, identified as Cleanswitch 2 or Cleanswitch, at all times the presses are in operation.
- (b) Pursuant to 326 IAC 8-1-6 and SPR 113-20307-00021, issued on May 27, 2005, the BACT for the one (1) heat set web offset lithographic printing press, identified as Lithoman 2, has been determined to be:
 - (1) The exhaust shall be vented to one of the two (2) regenerative thermal oxidizers (Cleanswitch or Cleanswitch 2) with a minimum of 97% destruction efficiency for VOC;
 - (2) The VOC content of the fountain solution shall be no greater than 3% VOC as applied;
 - (3) The blanket and roller washes shall have a vapor pressure no greater than 10 mm Hg at 20°C or the VOC content shall be limited to 2.5 lb/gal as applied; and

- (4) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94):
 - (A) 100 percent capture, by weight, of the VOC in press ready inks;
 - (B) 70 percent capture, by weight, of the VOC in press ready fountain solutions; and
 - (C) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.
- (c) Pursuant to 326 IAC 8-1-6 and SPR 113-23204-00021 issued on November 13, 2006, the BACT for the one (1) heat set web offset lithographic printing press, identified as Lithoman 3, has been determined to be:
 - (1) The exhaust shall be vented to the one (1) integrated recuperative thermal oxidizer, identified as TNV 1, with a minimum of 98% destruction efficiency for VOC as demonstrated by achieving a VOC outlet concentration of 20 ppmv or less as hexane, minus methane and ethane;
 - (2) The VOC content of the fountain solution shall be no greater than 3% VOC as applied;
 - (3) The blanket and roller washes shall have a vapor pressure no greater than 10 mm Hg at 20°C or the VOC content shall be limited to 2.5 lbs/gal as applied; and
 - (4) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 93):
 - (A) 100 percent capture, by weight, of the VOC in press ready inks;
 - (B) 70 percent capture, by weight, of the VOC in press ready fountain solutions; and
 - (C) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.
- (d) The VOC emissions from the printing presses, identified as Mark 16 and Mark 6, shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with these limits shall render the requirements of 326 IAC 8-1-6 not applicable.
- (e) The Heidelberg press has potential VOC emissions less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

State Rule Applicability – Insignificant Activities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) The insignificant welding consumes less than 625 pounds of weld wire or rod per day. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the insignificant welding is exempt from the requirements of 326 IAC 6-3.
- (b) The insignificant torch cutting is exempt from the requirements of 326 IAC 6-3 pursuant to 326 IAC 6-3-1(b)(10) since less than 3,400 inches per hour of stock, 1-inch thickness or less is cut.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This rule applies to sources that have VOC storage vessels located in Lake, Porter, Floyd, or Clark County. This source is located in Noble County, therefore the insignificant storage tanks are not subject to the requirements of 326 IAC 8-9.

Testing Requirements

- (a) The Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, utilizing methods as approved by the Commissioner. This test shall be performed by November 28, 2011 which is five (5) years from the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).
- (b) The Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch, utilizing methods as approved by the Commissioner. This test shall be performed by December 1, 2009, which is five (5) years from the date of the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).
- (c) Within one hundred eighty (180) days after initial startup, which is by June 1, 2007, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) integrated recuperative thermal oxidizer, identified as TNV 1, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous

compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

The thermal oxidizers, identified as Cleanswitch, Cleanswitch 2, and TNV 1, have applicable compliance monitoring conditions as specified below:

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers, identified as Cleanswitch, Cleanswitch 2, and TNV 1, at or above the three (3) hour average temperatures of 1,600°F, 1,600°F, and 1,400°F, respectively.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with 326 IAC 2-8 and 326 IAC 8-1-6, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the (3) hour average temperature as observed during the compliant stack tests.
- (d) The Permittee shall maintain a negative air flow pressure for the press dryers relative to the surrounding room as indicated by differential pressure gauges across the dryer inlets and outlets.
- (e) To demonstrate that a negative air flow pressure is achieved, the Permittee shall install differential pressure gauges at each of the dryer inlets and outlets, and measure and record the differential pressure across the inlets and outlets of the press dryers at least once per day.
- (f) Maintaining a negative air flow pressure across the dryer inlets and outlets shall yield the following capture efficiencies:
 - (1) 100 percent capture, by weight, of the VOC in press ready inks;
 - (2) 70 percent capture, by weight, of the VOC in press ready fountain solutions; and
 - (3) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.

The thermal oxidizers, identified as Cleanswitch, Cleanswitch 2, and TNV 1, must operate properly to ensure compliance with 326 IAC 8-1-6 (New facilities; general reduction requirements) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this stationary commercial printing source shall be subject to the conditions of the FESOP 113-20736-00021.

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

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
Permit Number: F 113-20736-00021
Reviewer: Brian J. Pedersen
Date: April 11, 2007

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
Lithoman 3	2211	57	794877

INK VOCS					
Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Ink-Process Black	4	34.56%	80.00%	794877	440
Ink-Process Blue	4	39.62%	80.00%	794877	504
Ink-Process Red	4	40.54%	80.00%	794877	516
Ink-Process Yellow	4	43.85%	80.00%	794877	558
Fountain Solution (Emerald AMVP)	0.15	87.40%	100.00%	794877	52.1
Cleaning Solvent (A-60 Odorless)	0.14	96.80%	50.00%	794877	26.9
Cleaning Solvent (LPC)	0.14	92.40%	50.00%	794877	25.7
Misc	0.001	75.00%	100.00%	794877	0.298

Total VOC Emissions =	637	Ton/yr
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METHODOLOGY

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

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

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

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

**Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
Permit Number: F 113-20736-00021
Reviewer: Brian J. Pedersen
Date: April 11, 2007**

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

INK VOCS					
Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Ink-Process Black	4	34.56%	80.00%	794877	440
Ink-Process Blue	4	39.62%	80.00%	794877	504
Ink-Process Red	4	40.54%	80.00%	794877	516
Ink-Process Yellow	4	43.85%	80.00%	794877	558
Fountain Solution (Emerald AMVP)	0.15	87.40%	100.00%	794877	52.1
Cleaning Solvent (A-60 Odorless)	0.14	96.80%	50.00%	794877	26.9
Cleaning Solvent (LPC)	0.14	92.40%	50.00%	794877	25.7
Misc	0.001	75.00%	100.00%	794877	0.298

Total VOC Emissions =	637	Ton/yr
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METHODOLOGY

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

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

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

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

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
Permit Number: F 113-20736-00021
Reviewer: Brian J. Pedersen
Date: April 11, 2007

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

INK VOCS						
Ink Name Press Id	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off %	Thermal Oxidizer Destruction Efficiency %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Ink-Process Black	4	35%	80.00%	95.00%	794877	440
Ink-Process Blue	4	40%	80.00%	95.00%	794877	504
Ink-Process Red	4	41%	80.00%	95.00%	794877	516
Ink-Process Yellow	4	44%	80.00%	95.00%	794877	558
Fountain Solution (Emerald AMVP)	0.15	87%	100.00%	66.50%	794877	52.1
Cleaning Solvent (A-60 Odorless)	0.14	97%	50.00%	0.00%	794877	26.9
Cleaning Solvent (LPC)	0.14	92%	50.00%	0.00%	794877	25.7
Misc	0.001	100%	100.00%	0.00%	794877	0.397

Total VOC Emissions =	637	Ton/yr
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METHODOLOGY

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

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

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

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

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
Permit Number: F 113-20736-00021
Reviewer: Brian J. Pedersen
Date: April 11, 2007

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
Mark 16	1265	35.5	283241

INK VOCS					
Ink Name Press Id	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /Year)	Emissions* (TONS/YEAR)
Ink - Process Black	1.3	34.57%	80.00%	283241	50.9
Ink - Process Cyan	1.3	40.54%	80.00%	283241	59.7
Ink - Process Magenta	1.3	39.62%	80.00%	283241	58.4
Ink - Process Yellow	1.3	43.84%	80.00%	283241	64.6
Ink - Book Black	1.3	31.63%	80.00%	283241	46.6
Ink - PMS Blue	1.3	41.85%	80.00%	283241	61.6
Fountain Solution	0.15	76.90%	100.00%	283241	16.3
Cleaning Solvent (A-60 Odorless)	0.06	96.80%	50.00%	283241	4.11
Cleaning Solvent (Impact System)	0.06	2.00%	50.00%	283241	0.085
Cleaning Solvent (LPC)	0.06	92.40%	50.00%	283241	3.93
MISC	0.0001	75.00%	100.00%	283241	0.011

Total VOC Emissions =	85.0	Ton/yr
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METHODOLOGY

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

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

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

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

Company Name: Courier Kendallville, Inc.
 Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
 Permit Number: F 113-20736-00021
 Reviewer: Brian J. Pedersen
 Date: April 11, 2007

THROUGHPUT Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
Heidelberg Sheetfed Press (Nonheatset Sheeted Offset)	400	39.5	99654

INK VOCS Ink Name Press Id	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /Year)	Emissions* (TONS/YEAR)
Ink - Process Black	3	5.00%	5.00%	99654	0.374
Ink - Process Cyan	3	5.00%	5.00%	99654	0.374
Ink - Process Magenta	3	5.00%	5.00%	99654	0.374
Ink - Process Yellow	3	5.00%	5.00%	99654	0.374
Ink - PMS	3	18.00%	5.00%	99654	1.35
Fountain Solution (ARS-JP)	0.54	84.05%	5.00%	99654	1.13
Fountain Solution (Emerald JRZ)	0.54	21.00%	5.00%	99654	0.283
Cleaning Solvent (Color Wash 1)	0.05	90.00%	50.00%	99654	1.12
Cleaning Solvent (505 Wash)	0.05	100.00%	50.00%	99654	1.25
Cleaning Solvent (Low VOC MRC)	0.05	100.00%	50.00%	99654	1.25
Cleaning Solvent (Color Wash 2)	0.05	100.00%	50.00%	99654	1.25
Misc	0.0001	75.00%	100.00%	99654	0.004

Total VOC Emissions =	3.73	Ton/yr
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METHODOLOGY

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

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

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

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

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
Permit Number: F 113-20736-00021
Reviewer: Brian J. Pedersen
Date: April 11, 2007

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
M850 (Heatset Web Offset)	1600	37.5	378432

INK VOCS					
Ink Name Press Id	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /Year)	Emissions* (TONS/YEAR)
Ink - Process Black	3	32.99%	80.00%	378432	150
Ink - Process Cyan	3	34.57%	80.00%	378432	157
Ink - Process Magenta	3	38.33%	80.00%	378432	174
Ink - Process Yellow	3	41.72%	80.00%	378432	189
Ink - Book Black	3	37.45%	80.00%	378432	170
Ink - PMS Yellow	3	37.43%	80.00%	378432	170
Fountain Solution	0.07	21.00%	100.00%	378432	2.78
Cleaning Solvent (A-60 Odorless)	0.03	96.80%	50.00%	378432	2.75
Cleaning Solvent (LPC)	0.03	4.70%	50.00%	378432	0.133
Cleaning Solvent (Impact System)	0.03	2.00%	50.00%	378432	0.057
Misc	0.0001	75.00%	100.00%	378432	0.014

Total VOC Emissions =	195	Ton/yr
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METHODOLOGY

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

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

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

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

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
Permit Number: F 113-20736-00021
Reviewer: Brian J. Pedersen
Date: April 11, 2007

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
M130 (Heatset Web Offset)	1264	37.5	298961

INK VOCS					
Ink Name Press Id	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /Year)	Emissions* (TONS/YEAR)
Ink - Process Black	4	32.99%	80.00%	298961	158
Ink - Process Cyan	4	34.57%	80.00%	298961	165
Ink - Process Magenta	4	38.33%	80.00%	298961	183
Ink - Process Yellow	4	41.72%	80.00%	298961	200
Ink - Book Black	4	37.45%	80.00%	298961	179
Ink - PMS Yellow	4	37.43%	80.00%	298961	179
Fountain Solution	0.07	21.00%	100.00%	298961	2.20
Cleaning Solvent (A-60 Odorless)	0.03	96.80%	50.00%	298961	2.17
Cleaning Solvent (LPC)	0.03	4.70%	50.00%	298961	0.105
Misc	0.0001	75.00%	100.00%	298961	0.011

Total VOC Emissions =	204	Ton/yr
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METHODOLOGY

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

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

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

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

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
Permit Number: F 113-20736-00021
Reviewer: Brian J. Pedersen
Date: April 11, 2007

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
Mark 6 (Heatset Web Offset)	950	35.5	212710

INK VOCS					
Ink Name Press Id	Maximum Coverage '(lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /Year)	Emissions* (TONS/YEAR)
Ink - Book Black	0.87	37.45%	80.00%	212710	27.7
Ink - PMS Yellow	0.87	37.43%	80.00%	212710	27.7
Fountain Solution	0.07	21.00%	100.00%	212710	1.56
Cleaning solvent (A-60 Odorless)	0.03	96.80%	50.00%	212710	1.54
Cleaning Solvent (LPC)	0.03	4.70%	50.00%	212710	0.075
Misc	0.0001	75.00%	100.00%	212710	0.008

Total VOC Emissions =	30.8	Ton/yr
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METHODOLOGY

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

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

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

**Appendix A: Emissions Calculations
HAP Emissions for Printing Presses**

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
Permit Number: F 113-20736-00021
Reviewer: Brian J. Pedersen
Date: April 11, 2007

Material	Maximum Print Width (inches)	Maximum Line Speed (feet/min)	Maximum Coverage (lbs/MMin^2)	Flash Off %	Weight % Xylene	Weight % Diethanolamine	Weight % Napthalene	Weight % Cumene	Weight % Glycol Ethers	Weight % Ethyl Benzene	Weight % Hexane	Xylene Emissions (ton/yr)	Diethanolamine Emissions (ton/yr)	Napthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Total HAPs per coating (ton/yr)	
Printing Press Mark 6																				
LPC	35.5	950	0.14	50.0%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.744	0.00	0.00	0.744	
Printing Press Mark 16																				
LPC	35.5	1265	0.14	50.0%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.991	0.00	0.00	0.991	
Printing Press M130																				
LPC	37.5	1264	0.14	50.0%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	1.05	0.00	0.00	1.05	
Printing Press M850																				
LPC	37.5	1600	0.14	50.0%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	2.65	0.00	0.00	2.65	
Heidelberg Sheetfed Press																				
Blanket Cleaner 505	40.125	1600	0.05	50.0%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.53
Low VOC Mrc	40.125	1600	0.05	50.0%	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.759	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.759
Color Wash #1	40.125	1600	0.05	50.0%	0.00%	0.00%	1.30%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.066	0.00	0.00	0.00	0.00	0.00	0.066
Ultra Clean #2	40.125	1600	0.05	50.0%	4.00%	3.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.202	0.152	0.00	0.10	0.00	0.00	0.00	0.00	0.456
Lithoman Press																				
Emerald AMVP	57	2211	0.15	100%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	8.94	0.00	0.00	8.94	
A-60 Odorless and LPC	57	2211	0.14	50.0%	5.00%	0.00%	0.00%	5.00%	0.00%	1.00%	0.00%	1.39	0.00	0.00	1.39	0.00	0.28	0.00	3.06	
Misc	57	2211	0.001	100.0%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	1.88%	0.00	0.00	0.00	0.00	0.040	0.00	0.01	0.047	
Lithoman 2 Press																				
Emerald AMVP	57	2211	0.15	100%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	8.94	0.00	0.00	8.94	
A-60 Odorless and LPC	57	2211	0.14	50.0%	5.00%	0.00%	0.00%	5.00%	0.00%	1.00%	0.00%	1.39	0.00	0.00	1.39	0.00	0.278	0.00	3.06	
Misc	57	2211	0.001	100%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	1.88%	0.00	0.00	0.00	0.00	0.040	0.00	0.01	0.047	
Lithoman 3 Press																				
Emerald AMVP	57	2211	0.15	100%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	8.94	0.00	0.00	8.94	
A-60 Odorless and LPC	57	2211	0.14	50.0%	5.00%	0.00%	0.00%	5.00%	0.00%	1.00%	0.00%	1.39	0.00	0.00	1.39	0.00	0.278	0.00	3.06	
Misc	57	2211	0.001	100%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	1.88%	0.00	0.00	0.00	0.00	0.040	0.00	0.01	0.047	

Total 6.70 0.152 0.066 4.27 32.4 0.835 0.022 44.1

Combination HAPs =	44.1 Ton/yr
Worst case single HAP =	32.4 Ton/yr

METHODOLOGY

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

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

HAP Emissions (tons/yr) = Maximum Coverage pounds per MMin^2 * Weight percentage HAP * Flash off * Throughput * Tons per 2000 pounds

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

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

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
Permit Number: F 113-20736-00021
Reviewer: Brian J. Pedersen
Date: April 11, 2007

Unit	MMBtu/hr
Mark 16	5.86
M850	8.80
Mark 6	5.12
M130	8.00
Lithoman dryer	10.50
Cleanswitch	0.810
Lithoman 2 dryer	10.50
Cleanswitch 2	0.810
Lithoman 3 dryer	10.50
TNV 1	5.31
Insignificant	9.31
Total	75.5

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

75.52

662

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.628	2.51	0.198	33.1	1.82	27.8

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 11 for HAPs emissions calculations.

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

**Company Name: Courier Kendallville, Inc.
 Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
 Permit Number: 113-20736-00021
 Reviewer: Brian J. Pedersen
 Date: April 11, 2007**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.00210	Dichlorobenzene 0.00120	Formaldehyde 0.07500	Hexane 1.80000	Toluene 0.00340
Potential Emission in tons/yr	0.000695	0.000397	0.024808	0.595400	0.001125

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	Total
Potential Emission in tons/yr	0.00017	0.00036	0.00046	0.00013	0.00069	0.624

Methodology is the same as page 10.

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

**Appendix A: Emissions Calculations
VOC Emissions for Binding Operations**

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
Permit Number: F 113-20736-00021
Reviewer: Brian J. Pedersen
Date: April 11, 2007

Norm Binder

	Amount (Lbs)		VOC/HAP % by Wt.		Emission Factor		VOC/HAP Emissions
Cover Glue Hot 2H782	129,800	x	0.0010	x	1	=	129.80 lbs
Side Glue Hot 2H858	7,921	x	0.0010	x	1	=	7.92 lbs
Primer Glue Cold 46939	10,800	x	0.00208	x	1	=	22.46 lbs
Total Actual							160.19 lbs
Total Actual Hours of Operation	7378	hrs					0.02 lbs/hr
Total Potential							380.38 lbs 0.190 tpy

Kolbus Binder

	Amount (Lbs)		VOC/HAP % by Wt.		Emission Factor		VOC/HAP Emissions
Cover Glue Hot 2H662	50,000	x	0.0014	x	1	=	70.00 lbs
Side Glue Hot 2H858	10,078	x	0.0010	x	1	=	10.08 lbs
Total Actual							80.08 lbs
Total Actual Hours of Operation	6361	hrs					0.01 lbs/hr
Total Potential							110.28 lbs 0.055 tpy

K2

	Amount (Lbs)		VOC/HAP % by Wt.		Emission Factor		VOC/HAP Emissions
Spine Glue Hot 2H932	60,207	x	0.0010	x	1	=	60.21 lbs
Headband Paste Hot V3869EN	132	x	0.00316	x	1	=	0.42 lbs
Casing-In Paste 834-77-1	13,504	x	0	x	1	=	- lbs
Total Actual							60.62 lbs
Total Actual Hours of Operation	4109	hrs					0.01 lbs/hr
Total Potential							129.24 lbs 0.065 tpy

Corrona Binder

	Amount (Lbs)		VOC/HAP % by Wt.		Emission Factor		VOC/HAP Emissions
Hot Melt HL3178X	146,025	x	0.00213	x	1	=	311.03 lbs
Primer WB1798	21,061	x	0.0051	x	1	=	107.41 lbs
Total Actual							418.44 lbs
Total Actual Hours of Operation	7378	hrs					0.06 lbs/hr
Total Potential							496.83 lbs 0.248 tpy
Total							0.558

Potential to emit (tons/yr) = Amount (Pounds) * (VOC/HAP % by Wt.) *(8760 hours/Hours of Operation) * (1 ton/2000 pounds)