



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: August 5, 2005

RE: R.R. Donnelley & Sons Company / 107-21171-00052

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

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Mr. Gary Calleo
R.R. Donnelley & Sons Company
1009 Sloan Street
Crawfordsville, IN 47933-2741

Re: **107-21171-00052**
First Minor Permit Modification to
Part 70 No.: T 107-5963-00052

Dear Mr. Calleo:

R.R. Donnelley & Sons Company was issued a permit on June 21, 2002, for a stationary book printing and binding source. A letter requesting changes to this permit was received on April 27, 2005. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of following changes:

- (1) Paragraphs South (4), (7), (10), and (11) for Presses 260, 261, 262, and 273 of the equipment list in Condition A.2 and the second page of the equipment description box in Section D.3 have been changed since each press is now being controlled by one (1) natural gas-fired thermal oxidizer, identified as RTO-1;
- (2) Condition D.3.10 was revised since RTO-1 is required to be in operation at all times when Presses 260, 261, 262, and 273 are in operation; and
- (3) Updates, additions and corrections to various conditions from Sections B and C of the permit have been implemented.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Michael S. Schaffer, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 631-691-3395 ext. 23 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
MSS/MES

cc: File - Montgomery County
U.S. EPA, Region V
Montgomery County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michelle Boner



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**PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY**

**R.R. Donnelley & Sons Company
1009 Sloan Street
Crawfordsville, Indiana 47933-2741**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T 107-5963-00052	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 21, 2002 Expiration Date: June 21, 2007

- Second Administrative Amendment 107-17119-00052, issued on February 4, 2003
- First Significant Permit Modification 107-16731-00052, issued on March 28, 2003
- Third Administrative Amendment 107-17255-00052, issued on April 8, 2003
- Second Significant Permit Modification 107-17225-00052, issued on May 13, 2003
- Fourth Administrative Amendment 107-17454-00052, issued on July 25, 2003
- Fifth Administrative Amendment 107-18767-00052, issued on March 15, 2004

First Minor Permit Modification No.: 107-21171-00052	Pages Affected: 2, 8, 9, 9a, 10 - 21, 23 -25, 28, 29, 36, 37, 40, 44, and 49 Pages Added: 2a
Original signed by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: August 5, 2005

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- (b) Boiler #2(S) with emissions exhausting through stack SB-4B(S).
 - (c) Boiler #3(S) with emissions exhausting through stack SB-4C(S).
- (2) Four (4) Paper Trim Cyclones:
- (a) Paper Trim Cyclone #1(S) emissions exhausting through stack SBP-5E(S).
 - (b) Paper Trim Cyclone #2(S) emissions exhausting through stack SBP-5E(S).
 - (c) Paper Trim Cyclone #3(S) emissions exhausting through stack SBP-5E(S).
 - (d) Paper Trim Cyclone #4(S) emissions exhausting through stack SBP-5E(S).
- (3) Two (2) Paper Dust Collectors:
- (a) Dust Collector #1(S) consists of two (2) cyclones each followed by a baghouse (two total) for particulate control and are exhausted through SD-6A(S) and new exhaust point SD-6C(S).
 - (b) Dust Collector #2(S) consists of a baghouse for particulate control and is exhausted through SD-6B(S).
- (4) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment, and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S).
- (5) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 270 with a maximum line speed of 807 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to SP-5F(S).
- (6) One (1) Cottrell heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 272 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5D(S).
- (7) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S).
- (8) One (1) Cottrell heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 274 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5C(S).

- (9) One (1) Cottrell heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 276 with a maximum line speed of 1200 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5E(S).
- (10) One (1) Toshiba heatset web offset lithographic printing press with four (4) units and one (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S).
- (11) One (1) Toshiba heatset web offset lithographic printing press with four (4) units and one (1) web identified as Press 261 with a maximum line speed of 1500 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S).
- (12) One (1) Hantscho heatset web offset lithographic printing press with one (1) unit and one (1) web identified as Press 290 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5G(S).
- (13) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 291 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5H(S).
- (14) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 293 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(S).
- (15) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 294 with a maximum line speed of 1076 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(S).
- (16) One (1) Hantscho heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 295 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5P(S).
- (17) One (1) Harris heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 296 with a maximum line speed of 860 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(S).
- (18) One (1) Heidelberg sheetfed offset lithographic press identified as Press 258 with a maximum line speed of 505 feet per minute and a maximum printing width of 40.5 inches including six (6) units and coater, exhausting to one (1) stack SP-5R(S) used as cooling air for electric heaters.

- (19) One (1) In-line Stainer 192 used for edge staining paper using low pressure-high volume spray coating and using dry filters for overspray control and exhausting through stack BS-4X(N).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T 107-5963-00052 is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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 Enforceability [326 IAC 2-7-7]

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.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

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 2-7-5(6)(D)]

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

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

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

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

The submittal by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish

to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U.S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) 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 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) 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.
- (d) 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.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official 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) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 in letter form no later than July 1 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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 2-7-5(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 the responsible official as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (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
Indianapolis, Indiana 46204

The PMP and the PMP extension notification do not require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (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 2-7-16.
- (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, 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: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

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

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 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) 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 2-7 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 materials of substantial economic value.

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

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 2-1.1-9.5]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(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
Indianapolis, Indiana 46204

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 the responsible official as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notifica-

tion by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this

existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) **Right to Operate After Application for Renewal [326 IAC 2-7-3]**
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 2-7 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.
- (d) **United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]**
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Indianapolis, Indiana 46204

Any such application shall be certified by the responsible official as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes 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 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
Indianapolis, Indiana 46204

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) 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.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [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.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).
- All required notifications shall be submitted to:
- Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10.1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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
Indianapolis, Indiana 46204

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 the responsible official as defined by 326 IAC 2-7-1(34).

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

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

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

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

The ERP does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) 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.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (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
Indianapolis, Indiana 46204
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (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.

Stratospheric Ozone Protection

C.21 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.

Facility Description [326 IAC 2-7-5(15)]:

(16) Four (4) UV sheetfed offset lithographic presses:

(a) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 232 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.

(b) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 233 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.

(c) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 238 with a maximum line speed of 434 feet per minute and a maximum printing width of 40 inches including six (6) units and coater, exhausting to one (1) stack SP-5V(N) used as cooling air for UV lamps.

(d) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 239 with a maximum line speed of 473 feet per minute and a maximum printing width of 40 inches including two (2) units and coater, exhausting to one (1) stack SP-5W(N) used as cooling air for UV lamps.

(18) One (1) conventional sheetfed offset lithographic press identified as Press 254 with a maximum line speed of 299 feet per minute and a maximum printing width of 60 inches.

South:

(4) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S).

(5) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 270 with a maximum line speed of 807 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to SP-5F(S).

(6) One (1) Cottrell heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 272 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5D(S).

(7) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S).

(8) One (1) Cottrell heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 274 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5C(S).

(9) One (1) Cottrell heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 276 with a maximum line speed of 1200 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5E(S).

(10) One (1) Toshiba heatset web offset lithographic printing press with four (4) units and one (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S).

(11) One (1) Toshiba heatset web offset lithographic printing press with four (4) units and one (1) web identified as Press 261 with a maximum line speed of 1500 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S).

(12) One (1) Hantscho heatset web offset lithographic printing press with one (1) unit and one (1) web identified as Press 290 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5G(S).

(13) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 291 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5H(S).

Facility Description [326 IAC 2-7-5(15)]:

- (14) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 293 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(S).
- (15) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 294 with a maximum line speed of 1076 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(S).
- (16) One (1) Hantscho heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 295 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5P(S).
- (17) One (1) Harris heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 296 with a maximum line speed of 860 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(S).
- (18) One (1) Heidelberg sheetfed offset lithographic press identified as Press 258 with a maximum line speed of 505 feet per minute and a maximum printing width of 40.5 inches including six (6) units and coater, exhausting to one (1) stack SP-5R(S) used as cooling air for electric heaters.
- (19) One (1) In-line Stainer 192 used for edge staining paper using low pressure-high volume spray coating and using dry filters for overspray control and exhausting through stack BS-4X(S).

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

Emissions Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-7-10.(d)(5)(A)]

- (a) The VOC content delivered to the applicator of each press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

$$\text{VOC emissions (tpy)} = (\text{ink usage} \times \text{volatile content} \times 80\% \text{ flash off}) + (\text{fountain solution usage} \times \text{volatile content} \times 100\% \text{ flash off}) + (\text{cleaner usage} \times \text{volatile content} \times 50\% \text{ flash off})$$

The following presses shall be limited:

Press 240, Press 241, Press 245, Press 289, Press 238, Press 239, Press 260, Press 261, Press 273, Press 290, Press 291, Press 293, Press 294, Press 295, and Press 296,

The requirements from Registered Construction and Operation Status letter issued June 19, 1988 (Press 240), and Registered Construction and Operation Status letter issued October 23, 1991 (Press 241), state that "Any change or modification which may increase the volatile organic compound potential emissions to 25 tons per year or more from the equipment covered in this registration must be approved by OAQ before such change may occur." The previous operating permits did not anticipate that the potential emissions would be greater than 25 tons per year and therefore did not address the requirements of 326 IAC 8-1-6. The source limited the running time in order to keep VOC emissions below 25 tons per year. Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.

The requirements from Registered Construction and Operation Status letter issued on November 8, 1989 and Registered Construction and Operation Status letter issued on February 2, 1987 (Press 260 and Press 261) to limit VOC emissions by limiting running

the following formula:

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

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

D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.7 Particulate Matter (PM)

The dry filters shall be in operation at all times Stainer 192 is in operation, in order to comply with this limit.

D.3.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Compliance stack tests shall be performed on the thermal oxidizers to determine the operating temperature and fan amperage or duct velocity at 90% minimum destruction of VOC within 180 days of issuance of this permit. These tests shall be repeated once every two and one (2 1/2) years. These tests shall be performed using methods approved by the OAQ. The OAQ shall be notified of the actual test date at least two weeks prior to the date, a test protocol shall be submitted to the OAQ, Compliance Data Section, 35 days in advance of the test, and all test reports must be received by the OAQ within 45 days of the completion of the testing.

D.3.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.2 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 manufacturer. 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.3.10 Thermal Oxidizer

The North Oxidizer shall operate at all times that either of the Presses 268 or 269 are operating. The South Oxidizer, identified as RTO-1, shall operate at all times that Presses 260, 261, 262, or 273 are in operation. When operating, the thermal oxidizers shall maintain a minimum operating temperature of 1350°F or the temperature and fan amperage or duct velocity determined at the stack tests that achieves a minimum 90% destruction efficiency of the VOC.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.11 Parametric Monitoring

- (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, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within the range as established in most recent compliant stack test.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above established range for any one reading.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: R.R. Donnelley & Sons Company
Source Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Mailing Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Part 70 Permit No.: T 107-5963-00052

This form consists of 2 pages

Page 1 of 2

<p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">X The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); andX The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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:

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

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: R.R. Donnelley & Sons Company
Source Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Mailing Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Part 70 Permit No.: T 107-5963-00052

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. 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".	
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
9 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:	

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Permit Modification

Source Background and Description

Source Name:	R.R. Donnelley & Sons Company
Source Location:	1009 Sloan Street Crawfordsville, Indiana 47933-2741
County:	Montgomery
SIC Code:	2732
Operation Permit No.:	T 107-5963-00052
Operation Permit Issuance Date:	June 21, 2002
Minor Permit Modification No.:	MPM 107-21171-00052
Permit Reviewer:	Michael S. Schaffer

The Office of Air Quality (OAQ) has reviewed a modification application from R.R. Donnelley & Sons Company relating to the operation of a regenerative thermal oxidizer as well as the removal of Press 297 (which was never constructed) from the permit. The changes were made to the following emission units (changes to any permitted equipment appear as ~~strikeouts~~, new language appears in **bold** using the equipment list from AAT 107-18767-00052, issued on March 15, 2004):

South:

- (4) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment, **and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, controlled by one (1) 1.894 MMBtu per hour natural gas fired thermal oxidizer ("South Oxidizer") exhausting to one (1) stack identified as SP-5N(S) Stack SP-5T(S).**
- (7) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, **and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to one (1) stack SP-5L(S) Stack SP-5T(S).**
- (10) One (1) Toshiba heatset web offset lithographic printing press with four (4) units and one (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, **and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to one (1) stack SP-5I(S) Stack SP-5T(S).**
- (11) One (1) Toshiba heatset web offset lithographic printing press with four (4) units and one (1) web identified as Press 261 with a maximum line speed of 1500 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, **and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to one (1) stack SP-5J(S) Stack SP-5T(S).**

~~(19) One (1) heatset offset lithographic printing press located in the South Plant, identified as Press 297, with two webs, exhausting through stack SP-5S(S), capacity: 1,076 feet per minute.~~

~~(20)~~(19) One (1) In-line Stainer 192 used for edge staining paper using low pressure-high volume spray coating and using dry filters for overspray control and exhausting through stack BS-4X(N).

History

On April 27, 2005, R.R. Donnelley & Sons Company submitted an application to the OAQ requesting to replace the South Oxidizer that currently vents from Press 262 with a regenerative thermal oxidizer, identified as RTO-1. In addition, R.R. Donnelley has requested that the proposed thermal oxidizer also control emissions from Presses 260, 261, and 273 as a Pollution Control Project as defined in 326 IAC 2-2-1(II)(4). R.R. Donnelley & Sons Company was issued a Part 70 permit on June 21, 2002.

On April 4, 2005, R.R. Donnelley & Sons Company submitted a letter to IDEM, OAQ in accordance with 326 IAC 2-2.3-1 (Pollution control project procedural requirements) which stated that a pollution control project that was listed under 326 IAC 2-2-1(II) was going to be installed. As a result of that submittal, this modification is considered to exempt from the source modification requirements of 326 IAC 2-7-10.5. In addition, this modification will be performed as a Part 70 Minor Permit Modification under the requirements of 326 IAC 2-7-12(b)(1)(G) for the operation of a pollution control project that is listed under 326 IAC 2-2-1(II).

Note that R.R. Donnelley & Sons Company has requested that the technical aspects of all existing limitations, compliance determination, compliance monitoring, record keeping and reporting requirements applicable to Presses 260, 261, 262, and 273 as well as the oxidizers that operate at this source remain unchanged as result of this modification.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
SP-5T(S)	Controlling VOC Emissions From Presses 260, 261, 262, and 273	45.0	2.67	21,736	420

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on April 27, 2005. Additional information was received on May 18 and June 6, 2005.

Emission Calculations

See Pages 1 and 2 in Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

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

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

Pollutant	Potential To Emit (tons/year)
PM	0.014
PM ₁₀	0.057
SO ₂	0.004
VOC	0.041
CO	0.625
NO _x	0.745

HAPs	Potential To Emit (tons/year)
Benzene	0.00002
Dichlorobenzene	0.00001
Formaldehyde	0.001
Hexane	0.013
Toluene	0.00003
Lead	0.000004
Cadmium	0.000008
Chromium	0.00001
Manganese	0.000003
Nickel	0.00002
TOTAL	0.014

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(b)(1)(G) for the addition of a PCP as

defined in 326 IAC 2-2-1(II).

County Attainment Status

The source is located in Montgomery County.

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

- (a) 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. Montgomery 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.
- (b) Montgomery County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions.
- (c) Montgomery County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

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

Pollutant	Emissions (tons/year)
PM	Less Than 250
PM ₁₀	Less Than 250
SO ₂	Less Than 250
VOC	Greater Than 250
CO	Less Than 250
NO _x	Less Than 250

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories.
- (b) These emissions are based upon the information contained in the table on Page 19 of 26 in the TSD to T 107-5963-00052, issued on June 21, 2002.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Pollutant	PM (tons/yr)	PM ₁₀ (tons/yr)	SO ₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO _x (tons/yr)
RTO -1*	0.014	0.057	0.004	0.041	0.625	0.745
PSD or Offset Significant Level	25	15	40	40	100	40

* The limited potential VOC emissions from Presses 260, 261, 262, and 273 will remain unchanged as part of this modification. Therefore, the emissions increases that will result from this modification only reflect the emissions increases from the combustion of natural gas associated with the installation of RTO-1.

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this proposed modification.

State Rule Applicability - Individual Facilities

The state rules applicable to Presses 260, 261, 262, and 273 will remain unchanged as a result of this modification.

Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to Presses 260, 261, 262, and 273 will remain unchanged as result of this modification.

Testing Requirements

The current testing requirements for the existing thermal oxidizers at this source in Condition D.3.8 of the Part 70 Operating Permit shall also apply to RTO-1. All tests performed on RTO-1 or thermal oxidizer equivalent shall continue to be performed once every 2.5 years as prescribed by the Part 70 Operating Permit.

Proposed Changes

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

Change 1:

Paragraphs South (4), (7), (10), and (11), which is the equipment lists for Presses 260, 261, 262, and 273, shall be revised and Paragraph South (19) for Press 297 shall be deleted in Condition A.2 and the equipment description box in Section D.3 as follows:

South:

- (4) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment, **and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour**, ~~controlled by one (1) 1.894 MMBtu per hour natural gas fired thermal oxidizer ("South Oxidizer")~~ exhausting to ~~one (1) stack identified as SP-5N(S)~~ **Stack SP-5T(S)**.
- (7) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, **and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour**, exhausting to ~~one (1) stack SP-5L(S)~~ **Stack SP-5T(S)**.
- (10) One (1) Toshiba heatset web offset lithographic printing press with four (4) units and one (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, **and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour**, exhausting to ~~one (1) stack SP-5I(S)~~ **Stack SP-5T(S)**.

- (11) One (1) Toshiba heatset web offset lithographic printing press with four (4) units and one (1) web identified as Press 261 with a maximum line speed of 1500 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, **and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to one (1) stack SP-5J(S) Stack SP-5T(S).**
- ~~(19) One (1) heatset offset lithographic printing press located in the South Plant, identified as Press 297, with two webs, exhausting through stack SP-5S(S), capacity: 1,076 feet per minute.~~
- ~~(20)~~(19) One (1) In-line Stainer 192 used for edge staining paper using low pressure-high volume spray coating and using dry filters for overspray control and exhausting through stack BS-4X(N).

Change 2:

RTO-1 for Presses 260, 261, 262, and 273 shall be included in the minimum operating temperature and destruction efficiency requirements mentioned in Condition D.3.10 as follows:

D.3.10 Thermal Oxidizer

- ~~(a)~~ The North Oxidizer shall operate at all times that either of the Presses 268 or 269 are operating. The South Oxidizer, **identified as RTO-1**, shall operate at all times that Presses **260, 261, 262, or 273** ~~is~~ **are** in operation. When operating, the thermal oxidizers shall maintain a minimum operating temperature of 1350°F or the temperature and fan amperage or duct velocity determined at the stack tests that achieves a minimum 90% destruction efficiency of the VOC.

Change 3:

Condition B.2 (Permit Term) will be revised as follows:

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, **T 107-5963-00052** is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.
- (b) **If IDEM, OAQ, upon receiving a timely and complete renewal 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.**

Change 4:

Conditions B.9(b) will be revised to clarify that the certification form may cover more than one (1) document that is submitted and Condition B.20(e) will be added to state that backup fuel switches will not be considered alternative operating scenarios as follows:

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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.**

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (e) **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.**

Change 5:

The OAQ, Technical Support and Modeling Section listed in Condition B.24(c) should now be the OAQ, Billing, Licensing, and Training Section. Therefore, Condition B.24(c) will be revised as follows:

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 **4230** (ask for OAQ, ~~Technical Support and Modeling Section~~ **Billing, Licensing, and Training Section**), to determine the appropriate permit fee.

Change 6:

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S.C. Section 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence as Condition B.25:

B.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [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.

Change 7:

The following revisions were made to Condition C.18 (Emission Statement Condition) to incorporate the revisions to 326 IAC 2-6 that became effective on March 27, 2004. The revised rule was published in the Indiana Register on April 1, 2004.

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) ~~The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~ Pursuant to **326 IAC 2-6-3(a)(1)**, the Permittee shall **submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**
- (1) Indicate **estimated** actual emissions of ~~criteria~~ **all** pollutants ~~from the source, in compliance with 326 IAC 2-6 (Emission Reporting) listed in 326 IAC 2-6-4(a);~~
 - (2) Indicate **estimated** actual emissions of ~~either~~ regulated pollutants **as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section**

19 of this rule“) from the source, for purposes of Part 70 fee assessment.

~~(b)~~ The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, ~~P. O. Box 6015~~
Indianapolis, Indiana **46204 -6015**

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

~~(e)~~**(b)** The annual emission statement 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.

Change 8:

“P.O. Box 6015” was removed from IDEM, OAQ’s mailing address and the zip code for IDEM, OAQ’s was changed from “46206-6015” to “46204” throughout the entire Part 70 Operating Permit.

Change 9:

The third sentence on the Quarterly Deviation and Compliance Monitoring report form has been replaced with the following sentence to be consistent with Section B - Deviations from Permit Requirements and Conditions:

<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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. 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>
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Conclusion

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Permit Modification No. 107 21171-00043.

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

Company Name: R.R. Donnelly & Sons Company
Address City IN Zip: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Permit Number: MPM 107-21171
Plt ID: 107-00052
Reviewer: Michael S. Schaffer
Application Date: April 27, 2005

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

Proposed Natural Gas-Fired Combustion Units
RTO-1 rated at 1.70 mmBtu/hr

1.70

15

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	0.014	0.057	0.004	0.745	0.041	0.625

*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 2 for HAPs emissions calculations.

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 Natural Gas Combustion Only
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 HAPs Emissions**

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Address City IN Zip: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Permit Number: MPM 107-21171
Plt ID: 107-00052
Reviewer: Michael S. Schaffer
Application Date: April 27, 2005

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.075	Hexane 1.80	Toluene 0.0034
Potential Emission in tons/yr	0.00002	0.00001	0.001	0.013	0.00003

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	0.000004	0.000008	0.00001	0.000003	0.00002	0.014

Methodology is the same as page 1.

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