



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: September 19, 2005
RE: Mossberg & Company / 141-21604-00063
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 1/10/05



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September 19, 2005

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Mr. Michael Vandenburg
Mossberg & Company, Inc.
P.O. Box 210
South Bend, Indiana 46624

Re: 141-21604-00063
Second Notice-only change to
MSOP 141-14368-00063

Dear Mr. Vandenburg:

Mossberg & Company, Inc. was issued a Minor Source Operating Permit on September 26, 2001 for a printing facility. A letter requesting to replace the existing printing press A with a new press L was received on August 8, 2005. Pursuant to the provisions of 326 IAC 2-6.1-6(d), the permit is hereby revised as follows:

1. The Permittee requested to replace the existing printing press A with one (1) non-heatset, sheetfed, offset lithographic printing press (identified as Press L). Press L will comply with the same applicable requirements and permit terms and conditions as other existing non-heatset offset lithographic printing presses (Presses B, C, D, J, and K). The potential to emit of the new printing press L is 9.66 tons/yr of VOC and less than 1.0 ton per year of total HAPs. According to the Technical Support Document for MSOP #141-14368-00063, issued on September 26, 2001, the potential to emit of VOC of the removed press A is 13.03 tons/yr. The potential to emit of this modification (9.66 tons/yr – 13.03 tons/yr = –3.37 tons/yr) is less than the permit revision thresholds in 326 IAC 2-6.1-6(g)(4) and the significant modification thresholds in 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset). Therefore, adding the new printing press L is considered a notice only change, pursuant to 326 IAC 2-6.1-6(d)(13).

In addition, since the potential VOC emissions from each of the existing presses B, C, D, J, and K are less than 25 tons/yr, Condition D.1.1 is not required and will be removed from the permit. Since the potential to emit HAP from the entire source is less than 10 tons/yr for a single HAP and less than 25 tons/yr for total HAPs, Condition D.1.3 is not required and will also be removed from the permit. There are no applicable requirements for the emission units listed in Section D.2. Therefore, Section D.2 will be removed from the permit as well. Condition A.2 and Sections D.1 and D.2 have been revised as follows to reflect these changes:

A.2 Emissions units and Pollution Control Equipment Summary

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

- (a) The printing operation:

- (1) ~~Press A: a non-heatset 28" by 40" 6-color sheetfed offset lithographic press with a maximum line speed of 380 feet per minute, press width of 40 inches, installed June 1989, exhausting to stack S001.~~

- (21) Press B: a non-heatset 20" by 29" 6-color sheetfed offset lithographic press with a maximum line speed of 416 feet per minute, press width of 29 inches, installed September 1997, exhausting to stack S002.
- (32) Press C: a non-heatset 28" by 40" 8-color sheetfed offset lithographic press with a maximum line speed of 467 feet per minute, press width of 40 inches, installed September 1997, exhausting to stack S003.
- (43) Press D: a non-heatset 22.5" by 28.5" 2-color sheetfed offset lithographic press with a maximum line speed of 312 feet per minute, press width of 28.5 inches, installed December 1983, exhausting inside the building.
- (54) Press H: a heatset 7" web letterpress with a maximum line speed of 150 feet per minute, press width of 7 inches, installed April 1985, exhausting to stack S008.
- (65) Press I: a heatset 10" ultraviolet flexographic press with a maximum line speed of 150 feet per minute, press width of 10 inches, installed December 1993, exhausting to stack S011.
- (76) Press J: a non-heatset 13" by 18" 2-color sheetfed offset lithographic press with a maximum line speed of 90 feet per minute, press width of 18 inches, installed September 1997, exhausting inside the building.
- (87) Press K: a non-heatset 28" by 40" 6-color, sheetfed offset lithographic press with a maximum line speed of 583 feet per minute, press width of 40 inches, exhausting to stack S012.
- (8) Press L: a non-heatset 28" by 40" 12-color sheetfed offset lithographic press with a maximum line speed of 467 feet per minute, press width of 40 inches, installed in 2005, and exhausting to stack S013.**
- (9) One prepress department producing printing plates for all presses.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

(a) The printing operation:

- ~~(1) Press A: a non-heatset 28" by 40" 6-color sheetfed offset lithographic press with a maximum line speed of 389 feet per minute, press width of 40 inches, installed June 1989, exhausting to stack S001.~~
- ~~(2) Press B: a non-heatset 20" by 29" 6-color sheetfed offset lithographic press with a maximum line speed of 416 feet per minute, press width of 29 inches, installed September 1997, exhausting to stack S002.~~
- ~~(3) Press C: a non-heatset 28" by 40" 8-color sheetfed offset lithographic press with a maximum line speed of 467 feet per minute, press width of 40 inches, installed September 1997, exhausting to stack S003.~~
- ~~(4) Press D: a non-heatset 22.5" by 28.5" 2-color sheetfed offset lithographic press with a maximum line speed of 312 feet per minute, press width of 28.5 inches, installed December 1983, exhausting inside the building.~~
- (54) Press H: a heatset 7" web letterpress with a maximum line speed of 150 feet per minute, press width of 7 inches, installed April 1985, exhausting to stack S008.

- (65) Press I: a heatset 10" ultraviolet flexographic press with a maximum line speed of 150 feet per minute, press width of 10 inches, installed December 1993, exhausting to stack S011.
- (7) ~~Press J: a non-heatset 13" by 18" 2-color sheetfed offset lithographic press with a maximum line speed of 90 feet per minute, press width of 18 inches, installed September 1997, exhausting inside the building.~~
- (8) ~~Press K: a non-heatset 28" by 40" 6-color, sheetfed offset lithographic press with a maximum line speed of 583 feet per minute, press width of 40 inches, exhausting to stack S012.~~
- (9) ~~One prepress department producing printing plates for all presses.~~

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

~~D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]~~

~~The VOC for each printing press A, B, C, D, J, and K 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) will not apply. Any change or modification which may increase the potential emissions to twenty five (25) tons per year or more of volatile organic compounds from any printing press must be approved by the Office of Air Quality (OAQ) before any such change may occur.~~

~~D.1.21 Volatile Organic Compounds (VOCs) [326 IAC 8-5-5]~~

~~...~~

~~D.1.3 Hazardous Air Pollutants~~

- ~~(a) The potential to emit of any single hazardous air pollutant (HAP) total from the printing operation is less than ten (10) tons per twelve (12) consecutive months.~~
- ~~(b) The potential to emit of a combination of hazardous air pollutants (HAPs) total from the printing operation is less than twenty five (25) tons per twelve (12) consecutive months.~~
- ~~(c) Any change or modification which may increase the potential emissions of a single HAP to greater than ten (10) tons per year or of a combination of HAP to greater than twenty five (25) tons per year must be approved by the Office of Air Quality (OAQ) before any such change may occur.~~

~~D.1.4-2 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1, D.1.2, and D.1.3.~~
 - ~~(1) The amount and of the VOC content of each ink, varnish, coating, fountain solution, press wash, prepress solution, and other VOC and HAP containing materials used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used; used in presses H and I.~~
 - ~~(2) The total VOC and HAP usage for each month; and~~

~~(3) The weight of VOCs and HAPs emitted for each month. VOC and organic HAP emissions from inks and varnishes used in non-heatset offset presses may be estimated as 5% of the VOC content of the ink or varnish.~~

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

~~(b) Heaters:~~

~~(1) Five (5) natural gas fired heaters with a capacity of 0.231 MMBtu per hour.~~

~~(2) Three (3) natural gas fired heaters with a capacity of 0.27 MMBtu per hour.~~

~~(3) One (1) natural gas fired heaters with a capacity of 0.17 MMBtu per hour.~~

~~(4) One (1) natural gas fired heater with a capacity of 0.06 MMBtu per hour.~~

~~(5) Four (4) natural gas fired heaters with a capacity of 0.08 MMBtu per hour.~~

~~(6) One (1) natural gas fired heater with a capacity of 0.255 MMBtu per hour.~~

~~(7) One (1) natural gas fired heater with a capacity of 0.25 MMBtu per hour.~~

~~(8) One (1) natural gas fired heater with a capacity of 0.22 MMBtu per hour.~~

~~(9) One (1) natural gas fired heater with a capacity of 0.27 MMBtu per hour.~~

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

Emission Limitations and Standards

~~There are no specifically applicable requirements for this equipment.~~

Upon further review, IDEM also made the following changes to the permit:

1. St. Joseph County has been designated as nonattainment for the 8-hour ozone standard. The potential to emit NOx and VOC from this source is less than 100 tons/yr. Therefore, this source is an Emission Offset Minor Source. In addition, this printing facility is not in 1 of the 28 source categories listed in 40 CFR 52.21 and 326 IAC 2-2 (PSD). Therefore, Condition A.1 has been revised as follows:

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

The Permittee owns and operates a stationary source that operates offset and flexographic printing presses.

Authorized Individual: **Michael Vandenburg Vice President Operations**
Source Address: 301 E. Sample Street, South Bend, Indiana 46601
Mailing Address: P.O. Box 210, South Bend, Indiana 46624-0210
Phone Number: 574-289-9253
SIC Code: 2759
County Location: St. Joseph

County Status: **Nonattainment for 8-hour Ozone Standard**
Attainment for all **other** criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD and **Emission Offset**
Minor Area Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

2. The mailing address for IDEM, OAQ has been changed as follows:

100 North Senate Avenue
~~P.O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204**

This change has been made throughout the whole permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No.A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms.Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by
Nysa L. James, Section Chief
Permits Branch
Office of Air Quality

Attachments

ERG/YC

cc: File – St. Joseph County
Northern Regional Office
St. Joseph County Health Department
Air Compliance Section Inspector – Rick Reynolds
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner



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**NEW CONSTRUCTION PERMIT
and
MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Mossberg & Company, Inc.
301 East Sample Street
South Bend, Indiana 46601**

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

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

Operation Permit No.: MSOP 141-14368-00063	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 26, 2001 Expiration Date: September 26, 2006

First Notice-Only Change No.: 141-19296-00063, issued on September 14, 2004

Second Notice-Only Change No.: 141-21604-00063	Affected Pages: 3, 4, 12
Issued by: Original signed by Nysa L. James, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 19, 2005

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary source that operates offset and flexographic printing presses.

Authorized Individual: Vice President Operations
Source Address: 301 E. Sample Street, South Bend, Indiana 46601
Mailing Address: P.O. Box 210, South Bend, Indiana 46624-0210
Phone Number: 574-289-9253
SIC Code: 2759
County Location: St. Joseph
County Status: Nonattainment for 8-hour Ozone Standard
Attainment for all other criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD and Emission Offset
Minor Area Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emissions units and Pollution Control Equipment Summary

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

- (a) The printing operation:
- (1) Press B: a non-heatset 20" by 29" 6-color sheetfed offset lithographic press with a maximum line speed of 416 feet per minute, press width of 29 inches, installed September 1997, exhausting to stack S002.
 - (2) Press C: a non-heatset 28" by 40" 8-color sheetfed offset lithographic press with a maximum line speed of 467 feet per minute, press width of 40 inches, installed September 1997, exhausting to stack S003.
 - (3) Press D: a non-heatset 22.5" by 28.5" 2-color sheetfed offset lithographic press with a maximum line speed of 312 feet per minute, press width of 28.5 inches, installed December 1983, exhausting inside the building.
 - (4) Press H: a heatset 7" web letterpress with a maximum line speed of 150 feet per minute, press width of 7 inches, installed April 1985, exhausting to stack S008.
 - (5) Press I: a heatset 10" ultraviolet flexographic press with a maximum line speed of 150 feet per minute, press width of 10 inches, installed December 1993, exhausting to stack S011.
 - (6) Press J: a non-heatset 13" by 18" 2-color sheetfed offset lithographic press with a maximum line speed of 90 feet per minute, press width of 18 inches, installed September 1997, exhausting inside the building.
 - (7) Press K: a non-heatset 28" by 40" 6-color, sheetfed offset lithographic press with a maximum line speed of 583 feet per minute, press width of 40 inches, exhausting to stack S012.

- (8) Press L: a non-heatset 28" by 40" 12-color sheetfed offset lithographic press with a maximum line speed of 467 feet per minute, press width of 40 inches, installed in 2005, and exhausting to stack S013.
 - (9) One prepress department producing printing plates for all presses.
- (b) Heaters:
- (1) Five (5) natural gas fired heaters with a capacity of 0.231 MMBtu per hour.
 - (2) Three (3) natural gas fired heaters with a capacity of 0.27 MMBtu per hour.
 - (3) One (1) natural gas fired heater with a capacity of 0.17 MMBtu per hour.
 - (4) One (1) natural gas fired heater with a capacity of 0.06 MMBtu per hour.
 - (5) Four (4) natural gas fired heaters with a capacity of 0.08 MMBtu per hour.
 - (6) One (1) natural gas fired heater with a capacity of 0.255 MMBtu per hour.
 - (7) One (1) natural gas fired heater with a capacity of 0.25 MMBtu per hour.
 - (8) One (1) natural gas fired heater with a capacity of 0.22 MMBtu per hour.
 - (9) One (1) natural gas fired heater with a capacity of 0.27 MMBtu per hour.

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

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

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

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases (i.e., the entire construction is not done continuously) a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or

deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

B.7 Permit Term [326 IAC 2-6.1-7]

This permit 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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Preventive Maintenance Plan [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 (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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 should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, 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.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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

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

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

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

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

C.7 Opacity [326 IAC 5-1]

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

permit:

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

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Record Keeping and Reporting Requirements

C.9 Malfunctions Report [326 IAC 1-6-2]

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

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

C.10 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C - Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.11 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data 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 and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality

100 North Senate Avenue
Indianapolis, Indiana 46204

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) 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.

C.13 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

- (a) The printing operation:
- (4) Press H: a heatset 7" web letterpress with a maximum line speed of 150 feet per minute, press width of 7 inches, installed April 1985, exhausting to stack S008.
 - (5) Press I: a heatset 10" ultraviolet flexographic press with a maximum line speed of 150 feet per minute, press width of 10 inches, installed December 1993, exhausting to stack S011.

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

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the VOC content of ink used in flexographic presses (Press H and Press I) shall not exceed 0.5 pounds of VOCs per pound of solids.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.2 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the VOC content of each ink used in presses H and I.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Mossberg & Company, Inc.
Address:	301 East. Sample Street
City:	South Bend, Indiana 46601
Phone #:	(317) 733-2637 (Michael Vandenburg)
MSOP #:	141-14368-00063

I hereby certify that Mossberg & Company, Inc. is

still in operation.

no longer in operation.

I hereby certify that is Mossberg & Company, Inc. is

in compliance with the requirements of MSOP 141-14368-00063

not in compliance with the requirements of MSOP 141-14368-00063

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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