



*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: March 02, 2006

RE: R.R. Donnelley & Sons Company / 085-21923-00009

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.*  
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*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
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Mr. Blaine Stookey  
R.R. Donnelley & Sons Company  
2801 West Old Road 30  
Warsaw, IN 46581-0837

March 02, 2006

Re: 085-21923-00009  
Fourth Significant Permit Modification to  
Part 70 Permit No.: 085-6040-00009

Dear Mr. Stookey:

R.R. Donnelley & Sons Company was issued a Part 70 permit on August 5, 2002 for the operation of publication rotogravure printing. An application to modify the permit was received by the Office of Air Quality (OAQ) on October 17, 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 includes:

- (a) Revising the monitoring requirements for the pollution control device on the chromium plating lines to reflect current requirements under 40 CFR 63.343(c) as amended July 19, 2004, which specifies a pressure drop of  $\pm 2$  inches of water column.
- (b) Correcting the descriptive information for two (2) new heatset web offset lithographic presses (Presses WM-401 and WM-402) in Sections A.2 and D.6. There are no changes to the VOC emissions from the two (2) presses or destruction efficiency of the oxidizer as a result of the descriptive changes to Presses WM-401 and WM-402.
- (c) Removing three (3) rotogravure proof presses (WCM-440, WCM-450 and WCM-460) and deleting all related permit conditions.

All other conditions of the permit shall remain unchanged and in effect.



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 Alic Bent, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or at 973-575-2555, extension 3206, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

Original signed by  
Paul Dubenetzky, Assistant Commissioner  
Office of Air Quality

Attachments  
AB / EVP

cc: File - Kosciusko County  
U.S. EPA, Region V  
Kosciusko County Health Department  
IDEM Northern Regional Office  
Air Compliance Section Inspector – Doyle Houser  
Compliance Data Section  
Administrative and Development  
Technical Support and Modeling



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Indianapolis, Indiana 46204-2251  
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**PART 70 OPERATING PERMIT  
OFFICE OF AIR QUALITY**

**R.R. Donnelley & Sons Company  
Warsaw Manufacturing Division  
2801 West Old Road 30  
Warsaw, Indiana 46581-0837**

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

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

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.: T085-6040-00009	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: August 05, 2002 Expiration Date: August 05, 2007
First Administrative Amendment No.: 085-16533-00009	Issuance Date: October 4, 2002
Second Administrative Amendment No.: 085-17386-00009	Issuance Date: June 30, 2003
Third Administrative Amendment No.: 085-18023-00009	Issuance Date: September 8, 2003
First Significant Source Modification No.: 085-17834-00009	Issuance Date: December 3, 2003
First Significant Permit Modification No.: 085-18151-00009	Issuance Date: December 5, 2003
First Minor Source Modification No.: 085-18172-00009	Issuance Date: March 22, 2004
Second Significant Permit Modification No.: 085-18435-00009	Issuance Date: February 16, 2004
Fourth Administrative Amendment No.: 085-18825-00009	Issuance Date: April 14, 2004
Fifth Administrative Amendment No.: 085-18925-00009	Issuance Date: September 18, 2004
Second Significant Source Modification No.: 085-20370-00009	Issuance Date: March 31, 2005
Third Significant Permit Modification No.: 085-20472-00009	Issuance Date: April 18, 2005
Fourth Significant Permit Modification No.: 085-21923-00009	Pages Affected: Entire Permit
Issued by: Original signed by Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: March 02, 2006 Expiration Date: August 05, 2007

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Permit Reviewer: Holly M. Stockrahm

Modified by: AB/EVP

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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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a publication rotogravure printing operation.

Responsible Official:	Joe Kingan, Vice President of Manufacturing
Source Address:	2801 West Old Road 30, Warsaw, Indiana 46581-0837
Mailing Address:	P.O. Box 837, Warsaw, Indiana 46581-0837
General Source Phone No.	(574) 267-7101
SIC Code:	2754
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) Four (4) natural gas or No. 2 or No. 6 oil fired boilers described as follows:
  - (1) B1, installed in July of 1971 with a maximum rated capacity of 78 MMBtu/hr,
  - (2) B2 and B3, installed in October of 1979, each with a maximum rated capacity of 85 MMBtu/hr,
  - (3) B4, installed in June of 1994, with a maximum rated capacity of 98.4 MMBtu/hr.
- (b) Thirteen (13) publication rotogravure printing presses, each using a carbon adsorption solvent recovery system with seventeen (17) adsorbers as control, described as follows:
  - (1) WR-429, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute, and enclosed by permanent total enclosure (PTE),
  - (2) WRO-487, with a maximum printing width of 69 inches and a maximum line speed of 2000 feet per minute,
  - (3) WRO-488 and WRO-489, with each press having a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute,
  - (4) WRO-490, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2756 feet per minute,

- (5) WRO-491, WRO-492, and WRO-493, installed in August 1994, February 1995 and October 2002, respectively, with each press having a maximum printing width of 125 inches and a maximum line speed of 3000 feet per minute, and enclosed by permanent total enclosure (PTE).
- (6) WR-444, installed in December of 1996, with a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and, although not required by rule, enclosed by permanent total enclosure (PTE),
- (7) WR-441, WR-442, WR-443, installed in December of 1996, with each press having a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and enclosed by permanent total enclosure (PTE).
- (c) One (1) gravure cylinder wash machine, identified as GCW, installed in April of 1995, located in the east plant,
- (d) One (1) gravure parts press parts washer, identified as GPW, installed in 1991, located in the east plant
- (e) One (1) gravure cylinder wash machine, identified as WCWM, installed in May of 2000, located in the west plant, using the carbon adsorption solvent recovery system and enclosed by permanent total enclosure (PTE)
- (f) One (1) gravure press parts washer, identified as WGPW, installed in May of 2000, located in the west plant, enclosed by permanent total enclosure (PTE)
- (g) Two (2) chromium plating lines, CRT-1 and CRT-2, installed in September of 1994, using a composite mesh pad system with a hepafilter as control, each having two (2) rectifiers with a maximum combined capacity of 10,000 amps,
- (h) One (1) pneumatic dust and paper trim collection system located in the east plant and consisting of:
  - (1) One (1) cyclone, identified as EPC-3, installed in May of 1994, exhausting to one (1) baghouse, identified as EPBH-C, installed in June of 1994,
  - (2) One (1) cyclone, identified as EPC-1, installed in October of 2003.
  - (3) One (1) cyclone, identified as EPC-2, installed in 1978,
  - (4) One (1) cyclone concentrator, identified as EPCON-5, installed in June of 1995, exhausting to one (1) baghouse, EPBH-G, installed in September of 2003, EPCON-5 concentrated paper sent to EPC-3,
  - (5) Three (3) baghouses, identified as EPBH-C, EPBH-D, installed in June of 1994, and EPBH-E, with collected dust sent to one (1) dust auger, silo, and baghouse (EPBH-F) system,
  - (6) One (1) Baghouse EPBH-G, installed in September of 2003.
  - (7) One (1) cyclone, identified as EPC-4, with air exhausting to one (1) baghouse, EPBH-D with concentrated dust sent to one (1) dust auger, silo, and baghouse (EPBH-F) system.

- (i) One (1) pneumatic paper trim collection system located in the west plant and consisting of:
  - (1) One (1) cyclone, identified as WPC-1, installed in June of 1969,
  - (2) One (1) cyclone, identified as WPC-2, installed in June of 1969,
  - (3) One (1) cyclone concentrator, identified as WPCON-3, installed in August of 1993, modified in June 2002, with concentrated paper sent primarily to a cyclone, WPC-1 or secondarily to WPC-2, exhausting to one (1) baghouse, WPBH, installed in August of 1993,
  - (4) One (1) baghouse, identified as WPBH, with collected dust sent to cyclone, WPC-1 or WPC-2, with air exhausting to the bindery,
  - (5) One (1) cyclone concentrator, identified as WPCON-4, installed in August of 1993, modified June 2002, which has a maximum capacity of 10,500 pounds per hour, with concentrated paper sent primarily to cyclone WPC-1, or secondarily to WPC-2,
  - (6) One (1) cyclone concentrator, identified as WPCON-5, installed in June 2002, which has a maximum capacity of 10,500 pounds per hour, with concentrated paper sent primarily to cyclone WPC-1, or secondarily to WPC-2.
- (j) Six (6) cylinder making finishing sinks located in the east plant, identified as EPFS-1 through EPFS-6, installed in September of 1994,
- (k) One (1) wastewater treatment system located in the east plant and consisting of:
  - (1) One (1) 800-gallon solvent/water separator, identified as WWT-4, installed in 2003,
  - (2) One (1) 1000-gallon solvent/water separator, identified as WWT-2, installed in 1985,
  - (3) One (1) 17,800-gallon air sparging tank, identified as WWT-3, installed in 1985.
- (l) One (1) cylinder making finishing sink station located in the west plant, identified as WPFS-1, installed in April of 1990,
- (m) Thirty-seven (37) storage tanks, installed in dates ranging from 1960 through 1989, (specific dates are discussed in the Technical Support Document).
- (n) Eight (8) portable ink jet printers located in the east and west plants, identified as Ink Jet #1 through Ink Jet #8, each with a nominal throughput of 0.93 pounds of black ink and replenisher per hour, and one of which is an alternate ink jet printer with a maximum throughput of 0.064 pounds of ink, makeup and cleaner solvent per hour, with multiple exhaust stacks and associated ventilation ductwork, identified as IJP.
- (o) One (1) Heidelberg-Harris heatset web offset lithographic printing press with eight (8) units and two (2) webs identified as Press WM-401 with a maximum line speed of 1800 feet per minute and a maximum printing width of 38 inches, with associated in-line equipment and VOC emissions controlled by a regenerative thermal oxidizer, identified as RTO-1; and

- (p) One (1) Goss heatset web offset lithographic printing press with eight (8) units and two (2) webs identified as Press WM-402 with a maximum speed of 2500 feet per minute and a maximum printing width of 38 inches, with associated in-line equipment and VOC emissions controlled by a regenerative thermal oxidizer, identified as RTO-1.

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

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This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements. All insignificant activities are listed in the attached Technical Support Document.

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

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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]**

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

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- (a) This permit, T085-6040-00009, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

**B.4 Enforceability [326 IAC 2-7-7]**

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

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

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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)]**

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

**B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]**

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

**B.8 Certification [326 IAC 2-7-4(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.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (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 Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

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.10 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]**

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- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
- (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 46204-2251

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.11 Emergency Provisions [326 IAC 2-7-16]**

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- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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;

Permit Reviewer: Holly M. Stockrahm

Modified by: AB/EVP

- (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 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-7-5(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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.12 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)(8)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to T085-6040-00009 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

**B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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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.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (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 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by 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.

**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 noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification 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 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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.

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

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- (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 46204-2251  
  
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)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**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) 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]**

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- (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 limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (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 emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(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] [326 IAC 2-2-2]**

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]**

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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- (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 46204-2251

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)][326 IAC 2-1.1-7]**

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

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

**C.2 Opacity [326 IAC 5-1]**

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

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

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

**C.5 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.

**C.6 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (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 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by 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) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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- (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 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by 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 Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

#### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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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 46204-2251

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

The notification which shall be submitted by the Permittee does require the certification by 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.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

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

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

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

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

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

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

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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 46204-2251

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.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

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- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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

The response action documents submitted pursuant to this condition do 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 purpose of 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

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] [326 IAC 2-2]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;
      - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and
      - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
  - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by 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 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by 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, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for a project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

### **Stratospheric Ozone Protection**

#### **C.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

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

Four (4) natural gas or No. 2 or No. 6 oil fired boilers with emissions, described as follows:

- (a) B1, installed in July of 1971 with a maximum rated capacity of 85 MMBtu/hr,
- (b) B2 and B3, installed in October of 1979, each with a maximum rated capacity of 85 MMBtu/hr,
- (c) B4, installed in June of 1994, with a maximum rated capacity of 98.4 MMBtu/hr

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

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

**D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2]**

- (a) Pursuant to 326 IAC 6-2-3 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (c)), particulate emissions from boilers B1, B2, and B3 shall be limited to 0.8, 0.34, and 0.34 pounds of particulate matter per MM Btu of heat input, respectively, by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

- where Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input;
- C = maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter (µg/m3) for a period not to exceed a sixty (60) minute time period;
- Q = total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input;
- N = number of stacks in fuel burning operation;
- a = plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input; and
- h = stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times pa_i \times Q}{\sum_{i=1}^N pa_i \times Q}$$

- where:
- pa = the actual controlled emission rate in lb/mmBtu using the emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

- (b) Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate

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emissions from boiler B4 shall be limited to 0.24 pounds of PM per MM Btu by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{Where } Q = \text{total source capacity (MMBtu/hr)}$$

where Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and

Q = total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1]

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Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations), the SO<sub>2</sub> emissions from the ninety-eight and four-tenths (98.4) MMBtu per hour boiler B4 shall not exceed five tenths (0.5) pounds per million Btu heat input when burning distillate fuel oil.

#### D.1.3 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1]

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Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) the SO<sub>2</sub> emissions from the seventy-eight (78) MMBtu per hour and the two (2) eighty-five (85) MMBtu per hour oil-fueled boilers identified as B1, B2, and B3, respectively, shall not exceed five-tenths (0.5) pounds per MMBtu heat input when burning distillate oil, or one and six-tenths (1.6) pounds per MMBtu heat input when burning residual oil.

#### D.1.4 NSPS for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60, Subpart Dc] [326 IAC 12]

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Boiler B4 has a capacity greater than 10 MMBtu per hour and was constructed after the NSPS applicability date of June 9, 1989, therefore, it is subject to this NSPS. Pursuant to this rule:

- (a) The sulfur dioxide emissions from boiler B4 shall be limited to 0.5 pounds per million Btu of heat input. Boiler B4 shall be deemed in compliance with this rule when using either natural gas or No. 2 distillate fuel oil containing not in excess of 0.5% sulfur. However, this fuel oil sulfur content limit is superseded by more stringent limits elsewhere in this permit.
- (b) No gases discharged from Boiler B4 shall exhibit greater than 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity. Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

#### D.1.5 Sulfur Dioxide (SO<sub>2</sub>) and Oxides of Nitrogen (NO<sub>x</sub>) PSD Synthetic Minor Limitations [326 IAC 2-2]

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This source is a major PSD source and boilers B1, B2, B3, and B4 shall have the following SO<sub>2</sub> limits:

- (a) for boilers B1 and B2;
  - (1) 0.5 lb of SO<sub>2</sub> per MM Btu for distillate oil combustion.
  - (2) 1.6 lb of SO<sub>2</sub> per MM Btu for residual oil combustion.
  - (3) combined SO<sub>2</sub> emissions from B1 and B2 shall not exceed 245 tons per rolling 12 month average.  $3\{[(B1 \text{ No. 6 fuel oil usage per month} + B2 \text{ No. 6 fuel oil usage per month}) * (SO_2 \text{ EF (emission factor) for No. 6 fuel})] + [(B1 \text{ No. 2 fuel oil usage per month} + B2 \text{ No. 2 fuel oil usage per month}) * (SO_2 \text{ EF for No. 2 fuel})]\}$  # an average of 245 tons per 12 consecutive month period rolled on a monthly basis, where the EF for No. 6 fuel and the EF for No.2 fuel shall be based on the

sulfur content of the fuel burned and the AP-42 emission factors for boilers of less than 100 MMBtu/hr from Table 1.3-1 of AP-42 updated September 1998.

- (b) for boiler B4;
  - (1) No. 2 fuel oil consumption not to exceed a rolling 12 month average of 516 kgal per month with a sulfur content not to exceed 0.05%, and
  - (2) natural gas consumption not to exceed a rolling 12 month average of 72 million cubic feet per month.

### Compliance Determination Requirements

#### D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the SO<sub>2</sub> and PM limits specified in Conditions D.1.1, D.1.2, D.1.3, and D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.7 Sulfur Dioxide Emissions and Sulfur Content

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Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance for:

- (1) the ninety-eight and four-tenths (98.4) MMBtu per hour boiler B4 utilizing one of the following options:
  - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
  - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (a) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
    - (b) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (2) the two (2) 85 MMBtu per hour boilers, B1 and B2, and the one (1) 78 MMBtu per hour oil-fueled boiler B3 are not subject to the requirements of 40 CFR Dc, because they were constructed before the applicability date of the rule (June 9, 1989).

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

#### D.1.8 Visible Emissions Notations

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- (a) The Permittee will conduct one visible emission notation during normal operations at least once per week for each week during which the respective boiler is operated. A trained employee or other trained observer shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee or observer is someone who has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

#### **D.1.9 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.2, D.1.3, D.1.4, and D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc and 326 IAC 7-1.1-1, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of the visible emission notations of the boilers stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.10 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.4 and D.1.5, and the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**SECTION D.2****FACILITY OPERATION CONDITIONS****Facility Description [326 IAC 2-7-5(15)]:**

- (a) Thirteen (13) publication rotogravure printing presses, each using a carbon adsorption solvent recovery system with seventeen (17) adsorbers as control, described as follows:
- (1) WR-429, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute, and enclosed by permanent total enclosure (PTE),
  - (2) WRO-487, with a maximum printing width of 69 inches and a maximum line speed of 2000 feet per minute,
  - (3) WRO-488 and WRO-489, with each press having a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute,
  - (4) WRO-490, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2756 feet per minute,
  - (5) WRO-491, WRO-492, and WRO-493, installed in August 1994, February 1995 and October 2002, respectively, with each press having a maximum printing width of 125 inches and a maximum line speed of 3000 feet per minute, and enclosed by permanent total enclosure (PTE).
  - (6) WR-444, installed in December of 1996, with a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and, although not required by rule, enclosed by permanent total enclosure (PTE),
  - (7) WR-441, WR-442, WR-443, installed in December of 1996, with each press having a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and enclosed by permanent total enclosure (PTE).
- (b) One (1) gravure cylinder wash machine, identified as GCW, installed in April of 1995, located in the east plant,
- (c) One (1) gravure parts press parts washer, identified as GPW, installed in 1991, located in the east plant
- (d) One (1) gravure cylinder wash machine, identified as WCWM, installed in May of 2000, located in the west plant, using the carbon adsorption solvent recovery system and enclosed by permanent total enclosure (PTE)
- (e) One (1) gravure press parts washer, identified as WGPW, installed in May of 2000, located in the west plant, enclosed by permanent total enclosure (PTE)
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]****D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8-5-5]**

- (a) Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), the publication rotogravure presses shall be controlled by a carbon adsorption solvent recovery system that reduces the volatile organic emissions from the capture system by at least ninety percent (90%) by weight.
- (b) Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), the capture system shall attain an efficiency sufficient to achieve, at minimum, an overall control efficiency, in conjunction with the emission control system, of seventy-five percent (75%).

**D.2.2 VOC Limits [326 IAC 2-2]**

This source is a major PSD source and the following presses have VOC limits such that PSD rules, 326 IAC 2-2, shall not apply:

- (a) for rotogravure press WR-429;
  - (1) rolling 12 month average of 34550 ton per year VOC input (691 ton/yr VOC emissions).

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- (b) for rotogravure press WRO-490;
  - (1) rolling 12 month average of 4,910 tons per year of VOC input (average VOC potential to emit of 53.2 tons per 12 consecutive months with compliance determined at the end of each month), and
  - (2) monthly solvent recovery overall efficiency of no less than 87%.
  
- (c) for rotogravure presses WR-441, WR-442, and WR-443;
  - (1) rolling 12 month average of no greater than 789 ton per month VOC input, and
  - (2) rolling 12 month average of no less than 98% absorber efficiency, and
  - (3) PTE (100% capture).
  
- (d) for rotogravure press WR-444;
  - (1) rolling 12 month average of 260 tons per month VOC input.
  
- (e) for the parts and cylinder washers, WGPW and WCWM:
  - (1) monthly rolling average of 500 tons of VOC input per 12 consecutive months. When operating the carbon adsorption system to achieve this limit, the carbon adsorption system shall maintain an overall control efficiency of 98% per 12 month period, rolled on a monthly basis.
  - (2) In the event that the carbon adsorption system is not operating, the amount of VOC input to the parts and cylinder washers shall be limited such that the VOC input with the carbon adsorption system operating times 0.02 added to the VOC input with the carbon adsorption system not operating shall not exceed VOC emissions of ten (10) tons per twelve (12) consecutive month period, rolled on a monthly basis.

#### D.2.3 PSD BACT Limitations [326 IAC 2-2]

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Pursuant to 326 IAC 2-2 (PSD BACT Limitations), the specific facilities have the following limitations:

- (a) Pursuant to CP 085-3117-00009, issued December 10, 1993 and CP 085-4396-00009, issued on November 27, 1995, BACT is as follows for presses WRO-491, WRO-492 and WRO-493:
  - (1) Daily adsorber efficiency of no less than 95%;
  - (2) Rolling 12 month average of no less than 98% adsorber efficiency; and
  - (3) Permanent total enclosure (PTE) which is equivalent to 100% capture efficiency.

#### D.2.4 VOC Control Requirement [326 IAC 2-2] [40 CFR 52.21]

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Rotogravure presses WRO-487, WRO-488, WRO-489 were constructed prior to the applicability date June 19, 1978, of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements. Pursuant to the Construction Permit for Press WR-429, some of the emissions reductions obtained by adding control to these presses were used to net out of later PSD requirements. Therefore, rotogravure press WRO-487 shall have a ducted capture system to the solvent recovery system with total control efficiency of no less than 75% on a monthly basis.

#### D.2.5 NSPS Requirements [326 IAC 12] [40 CFR 60, Subpart QQ]

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- (a) Publication Rotogravure Printing [326 IAC 12] [40 CFR 60, Subpart QQ]:
  - (1) Pursuant to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ) emissions of volatile organic compounds (VOC) from rotogravure presses WR-429, WR-441, WR-442, WR-443, WR-444, WRO-490, WRO-491, WRO-492 and WRO-493 shall not be greater than or equal to 16 percent of the total mass of VOC solvent and water used during any one performance averaging period.

- (2) Rotogravure presses WRO-487, WRO-488, and WRO-489 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ), because they were constructed before the applicability date of the rule (October 28, 1980).

D.2.6 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

- (a) The provisions of 40 CFR 60, Subpart A, apply to the rotogravure presses WR-429, WR-441, WR-442, WR-443, WR-444, WRO-490, WRO-491, WRO-492 and WRO-493, except when otherwise specified in 40 CFR 60.430 through 60.435, Subpart QQ.
- (b) The provisions of 40 CFR 60, Subpart A, do not apply to rotogravure presses WRO-487, WRO-488, and WRO-489 because the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ) does not apply.

D.2.7 Printing and Publishing NESHAP [326 IAC 14][40 CFR Part 63, Subpart KK]

The publication rotogravure presses, proof presses, cylinder and parts cleaners, ink and solvent mixing and storage equipment, and solvent recovery system are subject to 40 CFR Part 63, Subpart KK.

The Permittee shall limit the emissions of organic HAPs to no more than eight percent (8%) of the total volatile matter used each month. The emission limitation may be achieved by overall control of at least ninety-two percent (92%) of organic HAPs used, by substitution of non-HAP materials for organic HAPs, or by a combination of capture and control technologies and substitution of materials.

D.2.8 General Provisions Relating to NESHAP [326 IAC 14][40 CFR Part 63, Subpart KK]

The provisions of 40 CFR Part 63, Subpart A, apply to the publication rotogravure presses, proof presses, cylinder and parts cleaners, ink and solvent mixing and storage equipment, and solvent recovery system, except when otherwise specified in 40 CFR 63.820 through 63.831, Subpart KK.

D.2.9 Cold Cleaner Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, the owner or operator of the gravure cylinder wash machines, GCW, and WCWM, and the gravure press parts washers, GPW and WGPW, shall:

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

**Compliance Determination Requirements**

D.2.10 Monitoring to Demonstrate Continuous Compliance [326 IAC 14][40 CFR Part 63, Subpart KK]

- (a) Continuous compliance of the carbon adsorption control system shall be demonstrated by:
- (1) Performing a liquid-liquid material balance of the affected facility for each month as detailed in §63.824(b)(1)(i); or
- (2) Using continuous emission monitors, conducting an initial performance test of capture efficiency, and continuously monitoring a site specific operating parameter to assure the capture efficiency as specified in §63.824(b)(1)(ii).

- (b) A performance test demonstrating initial compliance for the solvent recovery system is not required if the Permittee chooses to comply by means of the monthly liquid-liquid material balance. Otherwise, initial performance testing shall be conducted in accordance with the methods specified in §63.827.
- (c) At all time that the carbon adsorption control system for the parts and cylinder washers is in operation and being utilized to demonstrate compliance with the VOC emission limitations, the control system shall be monitored using the inlet and outlet analyzers on the solvent recovery system and monitoring the pressure differential in the enclosure to meet permanent total enclosure requirements.

#### D.2.11 Compliance Determination [326 IAC 12] [40 CFR 60, Subpart QQ] [326 IAC 2-2]

- (a) The solvent recovery system shall be in operation at all times that any of the rotogravure printing presses, WR-441, WR-442, WR-443, WR-444, WRO-491, WRO-492 and WRO-493, singly or in combination, is in operation, or is being cleaned using organic solvents.

The source can comply with this condition by keeping the record of the malfunction reports of the solvent recovery system; and other malfunction reports of the presses, when the solvent recovery system is operating but the presses are not venting to the solvent recovery system.

- (b) The systems conveying the exhaust gases from the publication rotogravure production printing presses WR-429, WR-441, WR-442, and WR-443; WRO-491, WRO-492 and WRO-493, enclosures to the solvent recovery system shall operate at all times any of the presses in the respective enclosures are in operation, or are being cleaned using organic solvents. These enclosures shall have natural draft opening areas totaling not in excess of 5% of the total area of the walls, floor, and the ceiling of the enclosure. The enclosures shall be equipped with adequate negative pressure ventilation to provide a minimum face air velocity of 200 feet per minute, when all natural draft openings are simultaneously open. A pressure drop of greater than or equal to 0.013 mmHg (0.007 in H<sub>2</sub>O) will demonstrate the 200 feet per minute face air velocity. All cylinder access doors (on the gear side) shall remain closed during the press operations except for the emergency escape. All personnel access doors (on the button side) shall remain closed, except for the momentary opening to allow access of personnel and materials. If these criteria are met, the VOC capture of the enclosure shall be considered to be 100%. The source can comply with this condition by keeping the record of the malfunction reports of the systems conveying the exhaust gases from the enclosure; and other malfunction reports of the presses, when the systems conveying the exhaust gases from the enclosure to the absorber, are not operating but the presses in the respective enclosures are in operation.

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

#### D.2.12 Monitoring Requirements [326 IAC 14] [40 CFR 63.828]

To demonstrate continuing compliance with the standards of §63.824, the Permittee shall monitor and inspect the carbon adsorption solvent recovery system and the ducted solvent capture system to ensure proper operation and maintenance by implementing one of the following:

- (a) Performing a liquid-liquid material balance for each month.
- (b) Use of continuous compliance emission monitors that comply with the performance specifications 8 or 9 of 40 CFR 60, appendices B and F. In conducting the quarterly audits required by appendix F, the Permittee must challenge the monitors with compounds representative of the gaseous emission stream being controlled.

- (c) If the Permittee chooses to comply with §63.824 through continuous emission monitoring of the carbon adsorption solvent recovery system and the ducted solvent capture system, he/she shall install, calibrate, operate, and maintain continuous emission monitors to measure the total organic volatile matter concentration at the inlets of the ducted solvent system and the outlets of the carbon adsorption solvent recovery system.
- (d) If the Permittee chooses to comply with §63.824 through the use of the carbon adsorption solvent recovery system and the ducted solvent capture system and demonstrating continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, he/she shall:
  - (1) Submit to IDEM, OAQ at the address listed in Section C - General Reporting Requirements with the compliance status report required by §63.9(h), a plan that:
    - (A) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained;
    - (B) Discusses why this parameter is appropriate for demonstrating ongoing compliance, and
    - (C) Identifies the specific monitoring procedures.
  - (2) Set the operating parameter value, or range of values, that demonstrate compliance with the applicable emission standard of §63.824.
  - (3) Conduct monitoring in accordance with the plan submitted to IDEM, OAQ, unless comments received from IDEM, OAQ require an alternate monitoring scheme.
- (e) Any excursion from the required operating parameters which are monitored in accordance with Condition D.2.13(a) or (b), unless otherwise excused, shall be considered a violation of the applicable emission standard.

#### D.2.13 Carbon Adsorption Unit Monitoring

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- (a) An inspection shall be performed each calendar quarter of the carbon adsorption unit controlling the parts and cylinder washers. All defective beds shall be repaired or replaced. The Permittee is not required to shut down the system in order to conduct the quarterly inspection. The Permittee shall monitor and inspect the carbon adsorption solvent recovery system and the ducted solvent capture system to ensure proper operation and maintenance.
- (b) In the event that a failure of the carbon adsorber has been observed, the affected compartments will be shut down immediately until the failed units have been repaired or replaced.

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

#### D.2.14 Record Keeping Requirements

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- (a) To document compliance with Conditions D.2.1, D.2.2, D.2.3, D.2.4, D.2.5 and D.2.7, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP/ VOC usage limits and/or the VOC emission limits established in Conditions D.2.1, D.2.2, D.2.3, D.2.4, D.2.5 and D.2.7.
  - (1) The VOC and HAP content of the inks and cleaning solvents used for each

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- month;
  - (2) The cleanup solvent usage for each month;
  - (3) The total VOC and HAP usage for each month; and
  - (4) The weight of VOCs and HAPs emitted for each compliance period.
  - (5) The liquid-liquid material balances performed in accordance with §63.824.
  - (6) Other applicable record keeping requirements as specified in §63.829 to demonstrate compliance with 40 CFR 63.824, Conditions D.2.4 and D.2.6.
  - (7) The monthly average recovery efficiency for the carbon adsorption system.
  - (8) The malfunction reports of the systems as specified in Condition D.2.8.
- (b) To document compliance with Condition D.2.13, the Permittee shall maintain records of the results of the inspections required under D.2.14.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.15 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2, D.2.3(a), and D.2.4 and the compliance and performance testing reports required by 40 CFR §63.830 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### SECTION D.3 FACILITY OPERATION CONDITIONS

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

Two (2) chromium plating lines, CRT-1 and CRT-2, installed in September of 1994, using a composite mesh pad system with a hepafilter as control, each having two (2) rectifiers with a maximum combined capacity of 10,000 amps.

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

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

##### D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart N.

##### D.3.2 Chromium Electroplating and Anodizing NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to tanks, CRT-1 and CRT-2. A copy of this rule is attached.

##### D.3.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)]

- (a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.
- (b) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tanks by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm [equivalent to six and six-tenths times ten raised to the power of negative six grains of total chromium per dry standard cubic foot of ventilation air (6.6x10<sup>-6</sup> gr/dscf)]).

##### D.3.4 Work Practice Standards [326 IAC 14] [40 CFR 63.342(f)]

The following work practice standards apply to CRT-1 and CRT-2:

- (a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tanks CRT-1 and CRT-2, including the composite mesh pad system with the hepafilter as control and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.3.5.
- (b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.3.5.
- (c) These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.
- (d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAQ, which may include, but is not

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limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.

- (e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAQ, may require that the Permittee make changes to the OMP required by Condition D.3.5. Revisions may be required if IDEM, OAQ finds that the plan:
  - (1) Does not address a malfunction or period of excess emissions that has occurred;
  - (2) Fails to provide for the operation of tanks CRT-1 and CRT-2, the composite mesh pad system with hepafilter and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or
  - (3) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, monitoring equipment or other causes of excess emissions as quickly as practicable.

The work practice standards that address operation and maintenance must be followed during malfunctions and periods of excess emissions.

#### D.3.5 Operation and Maintenance Plan [326 IAC 14] [40 CFR 63.342(f)(3)]

- (a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tanks CRT-1 and CRT-2. The OMP shall specify the operation and maintenance criteria for tanks, the composite mesh pad and hepafilter and monitoring equipment and shall include the following elements:
  - (1) For the composite mesh-pad system (CMP):
    - (A) Quarterly visual inspections of the device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.
    - (B) Quarterly visual inspection of the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.
    - (C) Quarterly visual inspection of the duct work from the tank to the control device to ensure there are no leaks.
    - (D) Perform wash down of the composite mesh-pads in accordance with manufacturers recommendations.
- (b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the OMP, provided the alternative plans meet the above listed criteria in Condition D.3.5(a).
- (c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining tanks, the air pollution control device, the add-on air pollution control device and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.
- (d) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two

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- (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ.
- (e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ for the life of tanks or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAQ for a period of five (5) years after each revision to the plan.
- (f) Compliance with the requirements of this OMP satisfies the requirements of the Preventive Maintenance Plan (PMP) required under 326 IAC 2-7-5 (13).

### **Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]**

#### **D.3.6 Performance Testing [326 IAC 2-1.1-11][326 IAC 2-7-6(1)] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]**

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- (a) A performance test demonstrating initial compliance for tanks CRT-1 and CRT-2 was performed on April 16-18, 1998. During the initial performance test, it was determined that the average pressure drop across the composite mesh pad system was 6.1 inches of water and the average outlet chromium concentration is 0.0012 mg/dscm.
- (b) The Permittee is not required to further test tanks CRT-1 and CRT-2 by this permit. However, the IDEM may require testing when necessary to determine if the tanks are in compliance. If testing is required by the IDEM, compliance with the limit specified in Condition D.3.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.
- (c) Any change, modification, or reconstruction of these tanks, the composite mesh pad system and hepafilters or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

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

#### **D.3.7 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 63.343(c)]**

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Pursuant to 40 CFR 63.343(c)(1)(ii), when using a composite mesh-pad system to comply with the limit specified in Condition D.3.3, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day that either chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within  $\pm 2$  inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant values for pressure drop established during multiple performance tests.

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

#### **D.3.8 Record Keeping Requirements [326 IAC 2-7-5(3)] [40 CFR 63.346]**

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The Permittee shall maintain records to document compliance with Conditions D.3.5, D.3.6 and D.3.7 using the forms provided with this permit. These records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit and include a minimum of the following:

- (a) Inspection records for the air pollution control techniques, the composite mesh pad system and hepafilter and monitoring equipment to document that the inspection and maintenance required by Conditions D.3.5 and D.3.7 have taken place. The record can

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take the form of a checklist and should identify the following:

- (1) The device inspected;
  - (2) The date of inspection;
  - (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and
  - (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (b) Records of all maintenance performed on tanks CRT-1 and CRT-2, the composite mesh pad system and hepafilter and monitoring equipment.
  - (c) Records of the occurrence, duration, and cause (if known) of each malfunction of tanks CRT-1 and CRT-2, the composite mesh pad and hepafilter and monitoring equipment.
  - (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tanks CRT-1 and CRT-2, the composite mesh pad and hepafilter and monitoring equipment as indicated by monitoring data collected in accordance with this condition.
  - (e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.
  - (f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.
  - (g) Test reports documenting results of all performance tests.
  - (h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.
  - (i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.
  - (j) The total process operating time of each tank, during the reporting period.
  - (k) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.3.9.

D.3.9 Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345 and 63.347]

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The notifications and reports required in this section shall be submitted to IDEM, OAQ using the address specified in Section C - General Reporting Requirements. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(a) Notifications:

(1) Initial Notifications

The Permittee shall notify IDEM, OAQ in writing that the source is subject to 40 CFR Part 63, Subpart N. The notification shall be submitted no later than one hundred eighty (180) days after the compliance date and shall contain the information listed in 40 CFR 63.347(c)(1).

(2) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.

(A) The NCS shall be submitted to IDEM, OAQ, and shall list, for each tank,

the information identified in 40 CFR 63.347(e)(2).

(B) The NCS for tanks CRT-1 and CRT-2 was submitted to IDEM, OAQ.

(3) Notification of Construction or Reconstruction

Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ. In addition, the Permittee may not change, modify, or reconstruct tanks CRT-1 and CRT-2 without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ.

(A) The NCR shall contain the information identified in 40 CFR 63.345(b)(2) and (3).

(B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both existing tanks and non-affected facilities by a common control technique or device.

(C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tanks CRT-1 and CRT-2 serves as this notification.

(D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAQ before construction, modification, or reconstruction may commence.

(b) Performance Test Results

The Permittee shall document results from the initial performance test and any future performance tests in a complete test report that contains the information required in 40 CFR 344(a).

The Permittee shall submit reports of performance test results as part of the Notification of Compliance Status, described in 40 CFR 63.347(e), no later than forty-five (45) days following the completion of the performance test.

(c) Ongoing Compliance Status Report

The Permittee shall prepare summary reports to document the ongoing compliance status of tanks CRT-1 and CRT-2 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tanks CRT-1 and CRT-2 are located at a site that is a major source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be completed and submitted according to the following schedule.

(1) This report shall be submitted semiannually on a calendar year basis, unless otherwise directed by IDEM, OAQ. The report shall be submitted within thirty (30) days after the end of each reporting period (which ends June 30 and December 31 respectively).

(2) If the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, quarterly reports shall be submitted.

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted quarterly until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

- (3) IDEM, OAQ may determine on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of this facility.

**SECTION D.4**

**FACILITY OPERATION CONDITIONS**

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

- (a) One (1) pneumatic dust and paper trim collection system located in the east plant and consisting of:
- (1) One (1) cyclone, identified as EPC-3, installed in May of 1994, exhausting to one (1) baghouse, identified as EPBH-C, installed in June of 1994,
  - (2) One (1) cyclone, identified as EPC-1, installed in October of 2003.
  - (3) One (1) cyclone, identified as EPC-2, installed in 1978,
  - (4) One (1) cyclone concentrator, identified as EPCON-5, installed in June of 1995, exhausting to one (1) baghouse, EPBH-G, installed in September of 2003, EPCON-5 concentrated paper sent to EPC-3,
  - (5) Three (3) baghouses, identified as EPBH-C, EPBH-D, installed in June of 1994, and EPBH-E, with collected dust sent to one (1) dust auger, silo, and baghouse (EPBH-F) system,
  - (6) One (1) Baghouse EPBH-G, installed in September of 2003.
  - (7) One (1) cyclone, identified as EPC-4, with air exhausting to one (1) baghouse, EPBH-D with concentrated dust sent to one (1) dust auger, silo, and baghouse (EPBH-F) system.
- (b) One (1) pneumatic paper trim collection system located in the west plant and consisting of:
- (1) One (1) cyclone, identified as WPC-1, installed in June of 1969,
  - (2) One (1) cyclone, identified as WPC-2, installed in June of 1969,
  - (3) One (1) cyclone concentrator, identified as WPCON-3, installed in August of 1993, modified in June 2002, with concentrated paper sent primarily to a cyclone, WPC-1 or secondarily to WPC-2, exhausting to one (1) baghouse, WPBH, installed in August of 1993,
  - (4) One (1) baghouse, identified as WPBH, with collected dust sent to cyclone, WPC-1 or WPC-2, with air exhausting to the bindery,
  - (5) One (1) cyclone concentrator, identified as WPCON-4, installed in August of 1993, modified June 2002, which has a maximum capacity of 10,500 pounds per hour, with concentrated paper sent primarily to cyclone WPC-1, or secondarily to WPC-2,
  - (6) One (1) cyclone concentrator, identified as WPCON-5, installed in June 2002, which has a maximum capacity of 10,500 pounds per hour, with concentrated paper sent primarily to cyclone WPC-1, or secondarily to WPC-2.

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

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

**D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]**

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the pneumatic paper dust and trim collection in the east plant system shall not exceed allowable PM emission rate of 20.3 pounds per hour based on a process weight rate of 10.19 tons of paper per hour using the following equation:  
Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the three (3) waste paper concentrators in the west plant system, WPCON- 3, WPCON-4, and WPCON-5, and the two (2) cyclones, WPC-1 and WPC-2, shall not exceed allowable PM emission rate of 26.00 pounds per hour based on a process weight rate of 31,500 pounds of paper per hour using the following equation:  
Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the Cyclone EPC-1 and Dust Auger and Silo shall be limited as follows:

Facility	Process Weight Rate	Particulate Emissions Limit (lb/hr)
Cyclone EPC-1	4.0	10.4
Dust Auger and Silo	2.25	7.1

These limits shall be determined using the following equation:

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

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

#### D.4.2 PSD Limit [326 IAC 2-2]

- (a) PM and PM-10 emissions from the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, shall be limited to 1.0 lb/ton and 0.6 lb/ton, respectively. Compliance with these limits shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable and also satisfy the requirement of Condition D.4.1.
- (b) Any change or modification to the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, that may increase potential emissions to greater than twenty-five (25) tons per year of PM, or fifteen (15) tons per year of PM-10, must have prior approval from the Office of Air Quality.
- (c) The input of paper to the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, shall be limited to less than 25,000 tons per twelve (12) consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of PM to less than 25 tons per 12 consecutive month period and PM10 to less than 15 tons per 12 consecutive month period. Compliance with this limit shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (d) The input of waste paper to the Cyclone EPC-1 shall be limited to 35,040 tons per twelve consecutive month period with compliance demonstrated at the end of each month.

- (e) Baghouse EPBH-F shall be in operation at all times the Dust Auger and Silo are in operation.

Compliance with (d) and (e) of this condition shall limit the Particulate Matter (PM) emissions to less than 25 tons per twelve consecutive month period and Particulate Matter Less Than Ten Microns (PM10) to less than 15 tons per twelve consecutive month period. Therefore, 326 IAC 2-2, Prevention of Significant Deterioration (PSD) shall not be applicable.

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

#### **D.4.3 Visible Emissions Notations**

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- (a) Weekly visible emission notations of the Cyclone EPC-1 (when venting to a baghouse) and EPBH-F, pneumatic paper dust and trim collection systems, WPC-1, WPC-2, WPCON-4, EPC-3 & EPBH-C stack exhausts, shall be performed once per week during normal daylight operations when exhausting to the atmosphere. A trained employee or other trained observer shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### **D.4.5 Baghouse and Cyclone Inspections**

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An inspection shall be performed each calendar quarter of EPBH-F, two (2) cyclones (WPC-1 and WPC-2) and the three (3) waste paper concentrators (WPCON-3, WPCON-4, WPCON-5) when venting to the atmosphere. A cyclone and baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

#### **D.4.6 Broken Bag or Failure Detection**

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In the event that bag failure has been observed:

- (a) Within eight (8) hours of the determination of failure, response steps including timetable for completion shall be devised.

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

#### **D.4.7 Record Keeping Requirements**

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- (a) To document compliance with D.4.2(c), the Permittee shall maintain monthly records of paper throughput to the three (3) waste paper concentrators (WPCON-3, WPCON-4, and WPCON-5), and the two (2) cyclones (WPC-1 and WPC-2).
- (b) To document compliance with D.4.2(d), the Permittee shall maintain monthly records of waste paper throughput to the Cyclone EPC-1.

- (c) To document compliance with Condition D.4.3, the Permittee shall maintain records of weekly visible emission notations of Cyclone EPC-1 and EPBH-F stack exhausts.
- (d) To document compliance with Condition D.4.4, the Permittee shall maintain records of the results of the inspections required under Condition D.4.4 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.4.8 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.4.2(c) and Condition D.4.2(d) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the report forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**SECTION D.5**

**FACILITY CONDITIONS**

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

Eight (8) portable ink jet printers located in the east and west plants, identified as Ink Jet #1 through Ink Jet #8, each with a nominal throughput of 0.93 pounds of black ink and replenisher per hour, and one of which is an alternate ink jet printer with a maximum throughput of 0.064 pounds of ink, makeup and cleaner solvent per hour, with multiple exhaust stacks and associated ventilation ductwork, identified as IJP.

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

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

**D.5.1 Volatile Organic Compounds (VOCs) Limits [326 IAC 2-2] [326 IAC 8-1-6][326 IAC 2-4.1-1]**

The following equipment has VOC and hazardous air pollutants (HAPs) usage limits such that 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) and 326 IAC 2-4.1-1 (New Source Toxics Control), shall not apply:

Eight (8) portable ink jet printers (Ink Jet #1 through Ink Jet #8)

- (a) Volatile Organic Compounds (VOCs) usage shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month; and
- (b) Hazardous air pollutants (HAPs) usage shall be limited to less than ten (10) tons of any single hazardous air pollutant (HAP) or to twenty-five (25) tons of any combination of HAPs. per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

**D.5.2 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)**

Compliance with the VOC and HAP usage limitations contained in Condition D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-14.

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

**D.5.3 Record Keeping Requirements**

- (a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.5.1.
  - (1) The VOC content of each ink and solvent used.
  - (2) The amount of ink and solvent used less water on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (3) The total solvent usage for each month;
  - (4) The total VOC and HAP usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.5.4 Reporting Requirements

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A quarterly summary of the information to document compliance with Conditions D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the report forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the 'responsible official' as defined by 326 IAC 2-7-1(34).

## SECTION D.6 FACILITY OPERATION CONDITIONS

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

- (a) One (1) Heidelberg-Harris heatset web offset lithographic printing press with eight (8) units and two (2) webs identified as Press WM-401 with a maximum line speed of 1800 feet per minute and a maximum printing width of 38 inches, with associated in-line equipment and VOC emissions controlled by a regenerative thermal oxidizer, identified as RTO-1; and
- (b) One (1) Goss heatset web offset lithographic printing press with eight (8) units and two (2) webs identified as Press WM-402 with a maximum speed of 2500 feet per minute and a maximum printing width of 38 inches, with associated in-line equipment and VOC emissions controlled by a regenerative thermal oxidizer, identified as RTO-1.

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

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

#### D.6.1 Volatile Organic Compounds (VOCs) Limits [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), the Best Available Control Technology (BACT) for the two (2) heatset web offset lithographic presses, identified as WM-401 and WM-402, shall be as follows:

- (a) The exhaust shall be vented to the Regenerative Thermal Oxidizer (RTO-1) with a minimum of 97% destruction efficiency for VOC;
- (b) The VOC content of the Fountain solution shall be no greater than 3% VOC as applied;
- (c) The blanket and roller washes shall have a vapor pressure no greater than 10 mm Hg at 20 °C or the VOC content shall be limited to 2.5 lb/gal as applied; and
- (d) The capture and retention efficiencies used for reporting compliance shall be as follows and are based on USEPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94):
  - (1) 100 percent capture, by weight, of the VOC in press ready inks;
  - (2) 70 percent capture, by weight, of the VOC in press ready fountain solutions;
  - (3) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents;
  - (4) 20 percent retention, by weight, of VOC in inks in the paper substrate; and
  - (5) 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers. Cleaning wipers shall always be placed in closed containers after use.

Compliance with the above limits and conditions will satisfy the Best Available Control technology (BACT) requirements of 326 IAC 8-1-6.

#### D.6.2 PSD Minor Limit [326 IAC 2-2]

The amount of VOC delivered to the substrate and the amount of VOC used for cleanup shall be limited such that the VOC emitted, after controls, is less than 39.6 tons from presses WM-401 and WM-402 combined per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will render the requirements of 326 IAC 2-2 (PSD) not applicable.

## Compliance Determination Requirements

### D.6.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

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Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer, at all times when at least one of the two (2) lithographic presses ( WM-401 and WM-402) is in operation, to achieve compliance with condition D.6.1 and D.6.2.

### D.6.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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Compliance with the VOC content and usage limitations contained in Conditions D.6.1 and D.6.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets, Material Safety Data Sheets, or other VOC content information. 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.6.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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Within sixty (60) days after achieving maximum capacity but no later than one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC destruction efficiency as per condition D.6.1 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

### D.6.6 VOC Emissions

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Compliance with Condition D.6.2 shall be demonstrated within 30 days of the end of each month. This shall be based on total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted do as to arrive at VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be arrived at using the following equation for usage:

$$\text{VOC emitted} = [(\text{VOC input from inks}) \times (1 - 0.2a) \times (1 - 0.97b) + (\text{VOC input from fountain solution}) \times (1 - 0.7c \times 0.97b) + (\text{VOC input from automatic cleaning solvents}) \times (1 - 0.4d \times 0.97b)] + (\text{VOC from manual cleaning solvents}) \times (1 - 0.5e)$$

- a. 20 percent retention, by weight, of VOC in inks in the paper substrate;
- b. 97 % destruction efficiency of VOC;
- c. 70 percent capture, by weight, of the VOC in press ready fountain solutions;
- d. 40 percent capture , by weight, of the VOC in press ready automatic cleaning solvents;
- e. 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers;

The Permittee shall use the destruction efficiency demonstrated from the most recent IDEM approved stack test and the capture and retention efficiencies listed in condition D.6.1(d).

### D.6.7 Thermal Oxidizer Temperature

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous shall mean no less often than once per minute. The output of this system shall be recorded continuously except when there is a fluctuation in the temperature of the thermal oxidizer such that the temperature falls below 1400 °F. At anytime the temperature falls below 1400 °F, the Permittee shall record the output of the system as a 3-hr average for that period. From the date of issuance of this permit until the approved

stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hr average temperature of 1400 °F.

- (b) The Permittee shall determine the 3-hr average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.6.1, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hr average temperature as observed during the compliant stack test.

#### D.6.8 Parametric Monitoring

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- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in condition D.6.1, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

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

#### D.6.9 Record Keeping Requirements

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- (a) To document compliance with Conditions D.6.1 and D.6.2, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.6.1 and D.6.2.
  - (1) The VOC content of each ink, coating material, cleanup solvent and fountain solution used.
  - (2) The amount of ink and coating material used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (3) The cleanup solvent usage for each month.
  - (4) The fountain solution usage for each month.
  - (5) Weight percent of VOC in fountain solution (wt %).
  - (6) The aggregate monthly VOC emissions and the annual VOC emissions.
  - (7) The continuous temperature records (on a 3-hr average basis whenever the temperature is not continuously above the minimum required temperature) for the thermal oxidizer and the 3-hr average temperature used to demonstrate compliance during the most recent compliant stack test.
  - (8) Daily records of the duct pressure or fan amperage.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.6.10 Reporting Requirements

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A quarterly summary of the information to document compliance with Conditions D.6.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the report forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the 'responsible official' as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division  
Source Address: 2801 West Old Road 30, Warsaw, Indiana 46581-0837  
Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

75

Warsaw, Indiana

Fourth Significant Permit Modification No.: 085-21923

OP No. T085-6040-

00009

Permit Reviewer: Holly M. Stockrahm

Modified by: AB/EVP

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**OFFICE OF AIR QUALITY**

**COMPLIANCE BRANCH**

**100 North Senate Avenue**

**Indianapolis, Indiana 46204-2251**

**Phone: 317-233-5674**

**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division

Source Address: 2801 West Old Road 30, Warsaw, Indiana 46581-0837

Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837

Part 70 Permit No.: T 085-6040-00009

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)	
C	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); and
C	The Permittee must submit notice in writing or by facsimile within two (2) working 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:

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

**Page 2 of 2**

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

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT  
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division  
Source Address: 2801 West Old Road 30, Warsaw, Indiana 46581-0837  
Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009

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

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected

Alternate Fuel

Days burning alternate fuel  
From                      To

<u>Boiler Affected</u>	<u>Alternate Fuel</u>	<u>Days burning alternate fuel</u> <u>From</u> <u>To</u>

*(can omit identification of boiler affected if only one gas boiler at this plant)*

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

Permit Reviewer: Holly M. Stockrahm

Modified by: AB/EVP

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
PART 70 OPERATING PERMIT  
CHROMIUM ELECTROPLATING AND ANODIZING NESHAP  
ONGOING COMPLIANCE STATUS REPORT**

Source Name: R. R. Donnelley & Sons Company - Warsaw Manufacturing Division  
 Source Address: 2801 West Old Road 30, Warsaw, Indiana 46581-0837  
 Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
 Part 70 Permit No.: T 085-6040-00009  
 Tank ID #: CRT-1 and CRT-2  
 Type of process: Hard  
 Monitoring Parameter: Pressure drop  
 Parameter Value: 6.1 ±2 inch of water  
 Limits: Total chromium concentration may not exceed 0.015 mg/dscm

**This form is to be used to report compliance for the Chromium Electroplating and Anodizing NESHAP only.  
 The frequency for completing this report may be altered by IDEM, OAQ, Compliance Branch.**

Companies classified as a major source: Submit this report no later than 30 days after the end of the reporting period.  
Companies classified as an area source: Complete this report no later than 30 days after the end of the reporting period, and retain on site unless otherwise notified.

**This form consists of 2 pages**

**Page 1 of 2**

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:
TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:

<b>MAJOR AND AREA SOURCES: CHECK ONE</b>
<input checked="" type="radio"/> NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.
<input type="radio"/> THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

<b>AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY:</b> IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

<b>HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY:</b> LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

Permit Reviewer: Holly M. Stockrahm

Modified by: AB/EVP

## CHROMIUM ELECTROPLATING AND ANODIZING NESHAP ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:

DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:

ADDITIONAL COMMENTS:

### ALL SOURCES: CHECK ONE

I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

Submitted by:

Title/Position:

Signature:

Date:

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

Permit Reviewer: Holly M. Stockrahm

Modified by: AB/EVP

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

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581-0837  
Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T085-6040-00009  
Facility: Press WRO-490  
Parameter: Volatile Organic Compound (VOC) input  
Limit: 4910 tons per year rolled on a 12 month basis

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

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

Attach a signed certification to complete this report.

Permit Reviewer: Holly M. Stockrahm

Modified by: AB/EVP

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

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581-0837  
Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T085-6040-00009  
Facility: Rotogravure Press WR-429  
Parameter: Volatile Organic Compound Input  
Limit: 34,550 ton per year rolled on a 12 month basis

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

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

Attach a signed certification to complete this report.

Permit Reviewer: Holly M. Stockrahm

Modified by: AB/EVP

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

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581-0837  
Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T085-6040-00009  
Facility: Presses WR-441, WR-442, and WR-443  
Parameter: Volatile Organic Compounds Input  
Limit: 789 tons per month rolled on a 12 month basis

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
 Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581-0837  
 Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
 Part 70 Permit No.: T085-6040-00009  
 Facility: Press WR-444  
 Parameter: Volatile Organic Compounds Input  
 Limit: 260 tons per month rolled on a 12 month basis

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581-0837  
Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T085-6040-00009  
Facility: Boilers B1 and B2  
Parameter: SO2  
Limit: 245 tons average per 12 month consecutive period

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

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

Attach a signed certification to complete this report.

Permit Reviewer: Holly M. Stockrahm

Modified by: AB/EVP

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

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581-0837  
Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T085-6040-00009  
Facility: Boiler B4  
Parameter: No. 2 Distillate Fuel Oil Input  
Limit: 516,000 gallons per month, rolled on a 12 month basis, at a sulfur content of 0.05%

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

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

Attach a signed certification to complete this report.

Permit Reviewer: Holly M. Stockrahm

Modified by: AB/EVP

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

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581-0837  
Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T085-6040-00009  
Facility: Boiler B4  
Parameter: Natural Gas Input  
Limit: 72 million cubic feet per month rolled on a 12 month basis

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

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

Attach a signed certification to complete this report.

Permit Reviewer: Holly M. Stockrahm

Modified by: AB/EVP

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

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581-0837  
Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T085-6040-00009  
Facility: Parts and Cylinder Washers, WGPW and WCWM  
Parameter: Volatile Organic Compound Input  
Limit: 500 ton per year rolled on a 12 month basis

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

**PART 70 SOURCE MODIFICATION QUARTERLY REPORT**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581-0837  
Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
Source Modification No.: 085-15579-00009  
Part 70 Permit No.: T085-6040-00009  
Facility: Three (3) waste paper concentrators (WPCON-3, WPCON-4, WPCON-5) and the two (2) cyclones (WPC-1 and WPC-2).  
Parameter: PM and PM10  
Limit: The input of paper to each of these processes, shall be limited to less than 25,000 tons per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Paper Input This Month	Paper Input Previous 11 Months	Paper Input 12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
 Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581-0837  
 Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
 Significant Source Modification: 085-17834  
 Part 70 Permit No.: T085-6040-00009  
 Facility: Cyclone EPC-1  
 Parameter: PM and PM10  
 Limit: 35,040 tons input of waste paper per twelve consecutive month period with compliance demonstrated at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Tons Input This Month	Tons Input Previous 11 Months	Tons Input 12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

**Part 70 Source Modification Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
 Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581-0837  
 Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
 Part 70 Permit No.: T 085-6040-00009  
 Source Modification No.: 085-18172-00009  
 Facility: Eight (8) portable ink jet printers, identified as Ink Jet #1 through Ink Jet #8.  
 Parameter: VOC and HAPs  
 Limit: (1) Volatile Organic Compounds (VOCs) usage shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month; and  
 (2) Hazardous air pollutants (HAPs) usage shall be limited to less than ten (10) tons of any single hazardous air pollutant (HAP) or to twenty-five (25) tons of any combination of HAPs per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

YEAR:

Month	Column 1		Column 2		Column 1 + Column 2	
	VOC Emissions		VOC Emissions		VOC Emissions	
Month 1						
Month 2						
Month 3						

YEAR:

Month	Column 1		Column 2		Column 1 + Column 2	
	HAP Emissions This Month		HAP Emissions Previous 11 Month		HAP Emissions 12 Month Total	
	Single	Combined Total	Single	Combined Total	Single	Combined Total
Month 1						
Month 2						
Month 3						

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

**Part 70 Source Modification Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
 Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581-0837  
 Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
 Part 70 Permit No.: T 085-6040-00009  
 Permit Modification No.: 085-20472-00009  
 Facility: Two (2) heatset web offset lithographic presses identified as WM-401 & WM-402  
 Parameter: VOC usage, VOC emissions  
 Limit: The amount of VOC delivered to the substrate and the amount of VOC used for cleanup shall be limited such that the VOC emitted, after controls, is less than 39.6 tons from presses WM-401 and WM-402 combined per twelve (12) consecutive month period. The following equation shall be used to determine the VOC emissions:

$$\text{VOC emitted} = [(\text{VOC input from inks}) \times (1 - 0.2^1) \times (1 - 0.97^2) + (\text{VOC input from fountain solution}) \times (1 - 0.7^3 \times 0.97^2) + (\text{VOC input from automatic cleaning solvents}) \times (1 - 0.4^4 \times 0.97^2)] + (\text{VOC from manual cleaning solvents}) \times (1 - 0.5^5)$$

1. 20 percent retention, by weight, of VOC in inks in the paper substrate;
2. 97 % destruction efficiency of VOC;
3. 70 percent capture, by weight, of the VOC in press ready fountain solutions;
4. 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents;
5. 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers;

YEAR:

Month	Column 1		Column 2		Column 1 + Column 2	
	VOC usage This Month	VOC Emissions This Month	VOC usage Previous 11 Months	VOC Emissions Previous 11 Months	VOC usage 12 Month Total	VOC Emissions 12 Month Total
Month 1						
Month 2						
Month 3						

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

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

**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 - Warsaw Manufacturing Division  
 Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581-0837  
 Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
 Part 70 Permit No.: T085-6040-00009

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

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".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

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

<b>Source Description and Location</b>
--

<b>Source Name:</b>	<b>R.R. Donnelley &amp; Sons Company</b>
<b>Source Location:</b>	<b>2801 West Old Road 30, Warsaw, Indiana 46581-0837</b>
<b>County:</b>	<b>Kosciusko</b>
<b>SIC Code:</b>	<b>2754</b>
<b>Operation Permit No.:</b>	<b>T 085-6040-00009</b>
<b>Operation Permit Issuance Date:</b>	<b>August 5, 2002</b>
<b>Significant Permit Modification No.:</b>	<b>085-21923-00009</b>
<b>Permit Reviewer:</b>	<b>Alic Bent/EVP</b>

<b>Existing Approvals</b>
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The source was issued a Part 70 Operating Permit T085-6040-00009 on August 5, 2002. The source has since received the following approvals:

- (a) First Administrative Amendment No.: 085-16533-00009, issued on October 4, 2002;
- (b) Second Administrative Amendment No.: 085-17386-00009, issued on June 30, 2003;
- (c) Third Administrative Amendment No.: 085-18023-00009, issued on September 8, 2003;
- (d) First Significant Source Modification No.: 085-17834-00009, issued on December 3, 2003;
- (e) First Significant Permit Modification No.: 085-18151-00009, issued on December 5, 2003;
- (f) First Minor Source Modification No.: 085-18172-00009, issued on March 22, 2004;
- (g) Second Significant Permit Modification No.: 085-18435-00009, issued on February 16, 2004;
- (h) Fourth Administrative Amendment No.: 085-18825-00009, issued on April 14, 2004;
- (i) Fifth Administrative Amendment No.: 085-18925-00009, issued on September 18, 2004;
- (j) Second Significant Source Modification No.: 085-20370-00009, issued on March 31, 2005;  
and
- (k) Third Significant Permit Modification No.: 085-20472-00009, issued on April 18, 2005.

**County Attainment Status**

The source is located in Kosciusko County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Kosciusko County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (c) Kosciusko County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

**Source Status**

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	2.38
PM10	2.38
SO <sub>2</sub>	0.16
VOC	354.63
CO	21.85
NO <sub>x</sub>	27.29

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon Second Significant Source Modification No.: 085-20370-00009, issued on March 31, 2005.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAP's	Potential To Emit (tons/year)
xylene	Greater than 10
toluene	Greater than 10
TOTAL	Greater than 25

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	No data
PM10	4
SO <sub>2</sub>	0
VOC	339
CO	22
NO <sub>x</sub>	27
HAP (specify)	No data

**Background and Description of Proposed Modification**

The Office of Air Quality (OAQ) has reviewed a significant permit modification application, submitted by R.R. Donnelley & Sons Company on October 17, 2005, relating to the following:

- (a) Revising the monitoring requirements for the pollution control device on the chromium plating lines to reflect current requirements under 40 CFR 63.343(c) as amended July 19, 2004, which specifies a pressure drop of ±2 inches of water column.
- (b) Correcting the descriptive information for two (2) new heatset web offset lithographic presses (Presses WM-401 and WM-402) in Sections A.2 and D.6. There are no changes to the VOC emissions from the two (2) presses or destruction efficiency of the oxidizer as a result of the descriptive changes to Presses WM-401 and WM-402.

- (c) Removing three (3) rotogravure proof presses (WCM-440, WCM-450 and WCM-460). All related permit conditions have been deleted.

**Enforcement Issues**

There are no pending enforcement actions.

**Emission Calculations**

There are no changes to facility or source emissions due to this permit modification.

**Permit Level Determination – Part 70**

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE due to the modification before controls. 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
PM10	0
SO <sub>2</sub>	0
VOC	0
CO	0
NO <sub>x</sub>	0
HAPs	0

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1) which states “every significant change in existing monitoring Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions shall be considered significant”, because it involves relaxing the monitoring requirements for the pollution control device on the chromium plating lines to reflect revisions to 40 CFR 63, Subpart N.

**Federal Rule Applicability Determination**

There are no new Federal Rules applicable to this source due to this modification.

**State Rule Applicability Determination**

There are no new State Rules applicable to this source due to this modification.

### Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance determination requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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.

There are no new compliance determination requirements or compliance monitoring requirements applicable to this source as a result of this modification.

### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T085-6040-00009. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

1. The following conditions in Sections A.2 and D.2, and the corresponding reporting forms of the Title V operating permit have been revised to reflect the removal of the rotogravure proof presses (WCM-440, WCM-450 and WCM-460) from the plant:

~~Three (3) rotogravure proof presses, using the carbon adsorption solvent recovery system described above as control described as follows:~~

- ~~(1) WCM-440, with a maximum printing width of 73 inches and a maximum line speed of 400 feet per minute~~
- ~~(2) WCM-450, installed in September of 1994, with a maximum printing width of 125 inches and a maximum line speed of 900 feet per minute,~~
- ~~(3) WCM-460, installed in December of 1993, with a maximum printing width of 78 7/8 inches and a maximum line speed of 600 feet per minute,~~

#### D.2.2 VOC Limits [326 IAC 2-2] ~~[40 CFR 52.21]~~

This source is a major PSD source and the following presses have VOC limits such that PSD rules, 326 IAC 2-2 ~~and 40 CFR 52.21~~, shall not apply:

- (d) for rotogravure press WR-444 ~~and proof press WCM-460;~~

#### D.2.3 PSD BACT Limitations [326 IAC 2-2] ~~[40 CFR 52.21]~~

Pursuant to 326 IAC 2-2 ~~and 40 CFR 52.21~~ (PSD BACT Limitations), the specific facilities have the following limitations:

- ~~(a) for proof press WCM-450;~~
  - ~~(1) no greater than 8.5 tons per month volatile organic solvents input limit, and~~
  - ~~(2) PTE (100% capture).~~

D.2.5 NSPS Requirements [326 IAC 12] [40 CFR 60, Subpart QQ]

(a) Publication Rotogravure Printing [326 IAC 12] [40 CFR 60, Subpart QQ]:

~~(3) Proof presses WCM-440, WCM-450, and WCM-460 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ), because proof presses are specifically exempted from that rule.~~

D.2.6 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

- (a) The provisions of 40 CFR 60, Subpart A, apply to the rotogravure presses WR-429, WR-441, WR-442, WR-443, WR-444, WRO-490, WRO-491, WRO-492, WRO-493, and WRO-494, except when otherwise specified in 40 CFR 60.430 through 60.435, Subpart QQ.
- (b) The provisions of 40 CFR 60, Subpart A, do not apply to rotogravure presses WRO-487, WRO-488, and WRO-489 or proof presses ~~WCM-440, WCM-450, and WCM-460~~ because the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ) does not apply.

D.2.121 Compliance Determination [326 IAC 12] [40 CFR 60, Subpart QQ]

- (a) The solvent recovery system shall be in operation at all times that any of the rotogravure printing presses, WR-441, WR-442, WR-443, WR-444, WRO-491, WRO-492, WRO-493, and WRO-494, and proof presses, ~~WCM-450, and WCM-460~~, singly or in combination, is in operation, or is being cleaned using organic solvents.

The source can comply with this condition by keeping the record of the malfunction reports of the solvent recovery system; and other malfunction reports of the presses, when the solvent recovery system is operating but the presses are not venting to the solvent recovery system.

- (b) The systems conveying the exhaust gases from the publication rotogravure production printing presses WR-429, WR-441, WR-442, and WR-443; WRO-491, WRO-492, WRO-493, and WRO-494 enclosures to the solvent recovery system shall operate at all times any of the presses in the respective enclosures are in operation, or are being cleaned using organic solvents. These enclosures shall have natural draft opening areas totaling not in excess of 5% of the total area of the walls, floor, and the ceiling of the enclosure. The enclosures shall be equipped with adequate negative pressure ventilation to provide a minimum face air velocity of 200 feet per minute, when all natural draft openings are simultaneously open. A pressure drop of greater than or equal to 0.013 mmHg (0.007 in H<sub>2</sub>O) will demonstrate the 200 feet per minute face air velocity. All cylinder access doors (on the gear side) shall remain closed during the press operations except for the emergency escape. All personnel access doors (on the button side) shall remain closed, except for the momentary opening to allow access of personnel and materials. If these criteria are met, the VOC capture of the enclosure shall be considered to be 100%.

The source can comply with this condition by keeping the record of the malfunction reports of the systems conveying the exhaust gases from the enclosure; and other malfunction reports of the presses, when the systems conveying the exhaust gases from the enclosure to the absorber, are not operating but the presses in the respective enclosures are in operation.

~~(c) The system conveying the exhaust gases from the proof presses, WCM-450 and WCM-460, to the solvent recovery system shall operate at all times the respective presses are in operation or are being cleaned using the organic solvents.  
 The source can comply with this condition by keeping the record of the malfunction reports of the systems conveying the exhaust gases from the enclosures; and other malfunction reports of the presses, when the systems conveying the exhaust gases from the enclosures to the adsorber, are not operating by the presses in the respective enclosures are in operation.~~

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

**Part 70 Quarterly Report**

Source Name: ~~RR Donnelley & Sons Company - Warsaw Manufacturing Division~~  
 Source Address: ~~2801 West Old Route 30, Warsaw, Indiana 46584~~  
 Mailing Address: ~~P. O. Box 837, Warsaw, Indiana 46586~~  
 Part 70 Permit No.: ~~T085-6040-00009~~  
 Facility: ~~Proof Press WCM-450~~  
 Parameter: ~~Volatile Organic Compounds Input~~  
 Limit: ~~8.5 tons per month rolled on a 12 month basis~~

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

~~No deviation occurred in this quarter.~~

~~Deviation/s occurred in this quarter.  
 — Deviation has been reported on:~~

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

~~Attach a signed certification to complete this report.~~

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

### Part 70 Quarterly Report

Source Name: RR Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: P. O. Box 837, Warsaw, Indiana 46586  
Part 70 Permit No.: T085-6040-00009  
Facility: Press WR-444 and ~~Proof Press WCM-460~~  
Parameter: Volatile Organic Compounds Input  
Limit: 260 tons per month rolled on a 12 month basis

2. The following descriptive information in Sections A.2 and D.6 of the Title V operating permit have been revised to update the description of Presses WM-401 and WM-402:

- (p) One (1) ~~Goss Heidelberg-Harris~~ heatset web offset lithographic printing press with ~~six~~ **eight (68)** units and ~~one~~ **two (42)** webs identified as Press WM-401 with a maximum line speed of 1800 feet per minute and a maximum printing width of 38 inches, with associated in-line equipment and VOC emissions controlled by a regenerative thermal oxidizer identified as RTO-1; and
- (q) One (1) Goss heatset web offset lithographic printing press with eight (8) units and two (2) webs identified as Press WM-402 with a maximum speed of ~~3000~~ **2500** feet per minute and a maximum printing width of ~~72~~ **38** inches, with associated in-line equipment and VOC emissions controlled by a regenerative thermal oxidizer identified as RTO-1.

3. Condition D.3.7 and the corresponding quarterly reporting from of the Title V operating permit have been revised to reflect the current requirements under 40 CFR 63.343(c), which specifies a pressure drop of  $\pm 2$  inches of water:

D.3.7 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 63.343(c)]

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Pursuant to 40 CFR 63.343(c)(1)(ii), when using a composite mesh-pad system to comply with the limit specified in Condition D.3.3, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day that either chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within  $\pm 42$  inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant values for pressure drop established during multiple performance tests.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
PART 70 OPERATING PERMIT  
CHROMIUM ELECTROPLATING AND ANODIZING NESHAP  
ONGOING COMPLIANCE STATUS REPORT**

Source Name: R. R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Road 30, Warsaw, Indiana 46580-8783  
Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009  
Tank ID #: CRT-1 and CRT-2  
Type of process: Hard  
Monitoring Parameter: Pressure drop  
Parameter Value: 6.1 ±42 inch of water

4. The following changes have been made to Section A.1.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a publication rotogravure printing operation.

Responsible Official: Joe Kingan, **Vice President of Manufacturing**  
Source Address: 2801 West Old Road 30, Warsaw, Indiana 46580-8783  
Mailing Address: P.O. Box 837, Warsaw, Indiana 46581-0837  
General Source Phone No. (574) 267-7101  
SIC Code: 2754  
County Location: Kosciusko  
~~County~~ **Source Location** Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major **Source**, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

5. The P.O. box and the zip code on the cover page and throughout the permit have been revised to reflect the latest model update.

6. Conditions B.2, B.7, B.9 (now re-numbered B.8), B.14 (now re-numbered B.13) and B.17 have been revised and Condition B.3 added to the permit to further address and clarify the permit term and the term of the conditions. Condition B.4 (Termination of Right to Operate) has been moved and re-numbered B.14. All other Section B conditions have been re-numbered accordingly.

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 15-13-6(a)]**

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**(a)** This permit, **T085-6040-00009**, is issued for a fixed term of five (5) years from the ~~original~~ **issuance date of this permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date **of this permit**.

**(b)** If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) **the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or**

(b) **the emission unit to which the condition pertains permanently ceases operation.**

**B.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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015~~

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

~~(b) (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by 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) (b) For information furnished by the Permittee to IDEM, OAQ, tThe 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.98** ~~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.143** ~~Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]~~

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~~(a) All terms and conditions of previous permits **established prior to T085-6040-00009 and** issued pursuant to permitting programs approved into the state implementation plan have been either:~~

- ~~(1) incorporated as originally stated,~~
- ~~(2) revised **under 326 IAC 2-7-10.5,** or~~
- ~~(3) deleted **under 326 IAC 2-7-10.5.**~~

~~by this permit.~~

- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this Part 70 operating permit.**

**B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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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.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (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, P.O. Box 6015  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by 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.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]**

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- (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, P.O. Box 6015  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

- (b) ~~Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]~~

~~(1) A timely renewal application is one that is:~~

- ~~(A) (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and~~

~~(B)~~ **(2)** If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

~~(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.

7. The following was added to clarify that sources can add an electric generator or similar device for a few months without seeking a modification. An engine no longer meets the definition of "nonroad engine" once it remains at the source for 12 consecutive months, or a shorter period of time for a unit located at a seasonal source.

**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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015 **46204-2251**

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)]

**(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.**

8. Condition B.8 (Compliance with Permit Conditions) has been removed from the B section and has been added to the Part 70 title page instead.

~~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 provision 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 provisions 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.~~

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

**R.R. Donnelley & Sons Company  
Warsaw Manufacturing Division  
2801 West Old Road 30  
Warsaw, Indiana 46581-0837**

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

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

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.

9. Condition B.21 has been updated to include a new paragraph "b" concerning modifications to a major source.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2]**

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- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) **Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2.**

10. Condition B.22 has been revised to reflect the current Part 70 permit language.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]**

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, h**Have access to and copy any records that must be kept under the conditions of this permit;
- (c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, i**Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, s**Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, u**Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

11. Upon further review, IDEM, OAQ has determined that it is not necessary to include a condition requiring a preventive maintenance plan in each individual Section D of the permit. Rather, a general condition will be placed in Section B of the permit, which will apply to the entire source. Conditions D.1.6, D.2.10, D.4.3, D.5.3, D.5.4(b) (now re-numbered D.5.3(b)), D.6.3 and D.6.10(b) (now re-numbered D.6.9(b)) have been removed from the permit, and item (a) in Section B has been revised. Additionally, IDEM, OAQ has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows:

**B.140 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:~~ **for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:**
- (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, P.O. Box 6015  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- ~~(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~
- ~~(e)~~ **(b)** A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(d)~~ **(c)** To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.121 Emergency Provisions [326 IAC 2-7-16]**

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- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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 (asks 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, P.O. Box 6015  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**  
  
within two (2) working days of the time when emission limitations were exceeded due to the emergency.  
  
The notice fulfills the requirement of 326 IAC 2-7-5(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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

~~D.1.6 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 the boilers.~~

~~D.2.10 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 the carbon adsorption solvent recovery system.~~

~~D.4.3 Preventive Maintenance Plan~~

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.~~

~~D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of the permit, is required for this facility.~~

~~D.5.43 Record Keeping Requirements~~

- ~~(b) To document compliance with Condition D.5.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

~~D.6.3 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 these facilities and its control device.~~

~~D.6.409 Record Keeping Requirements~~

- ~~(b) To document compliance with Condition D.6.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

12. IDEM, OAQ has clarified the Condition B.20 (Operational Flexibility) as follows:

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~~ **limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

and

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

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

- (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions trading **trades** that are subject to 326 IAC 2-7-20(b), (c), or (e). ~~and makes~~ **The Permittee shall make** such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (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 **emissions** increases and decreases ~~in emissions in~~ **at** the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(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.**

13. Section B.24 has been revised to include the recent changes regarding the phone number for the Permittee to call on annual fee payment.

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

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. 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 0425~~ (ask for OAQ, ~~Technical Support and Modeling Section~~ **Billing, Licensing and Training Section**), to determine the appropriate permit fee.
14. Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule is incorporated into the Part 70 permit as follows:

**B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]**

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

15. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Conditions C.1 and D.4.1 have been revised which contained these requirements.
- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) ~~p~~**P**ounds per ~~h~~**H**our [326 IAC 6-3-2(e)]
- 
- ~~Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~
- Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.**
- D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]
- 
- (a) Pursuant to 326 IAC 6-3-2 (~~Process Operations-Particulate Emission Limitations for Manufacturing Processes~~), the allowable PM emission rate from the pneumatic paper dust and trim collection in the east plant system shall not exceed allowable PM emission rate of 20.3 pounds per hour based on a process weight rate of 0.19 tons of paper per hour using the following equation:
- (b) Pursuant to 326 IAC 6-3-2 (~~Process Operations-Particulate Emission Limitations for Manufacturing Processes~~), the allowable PM emission rate from the three (3) waste paper concentrators in the west plant system, WPCON- 3, WPCON-4, and WPCON-5, and the two (2) cyclones, WPC-1 and WPC-2, shall not exceed allowable PM emission rate of 26.00 pounds per hour based on a process weight rate of 31,500 pounds of paper per hour using the following equation:
- (c) Pursuant to 326 IAC 6-3-2 (~~Process Operations-Particulate Emission Limitations for Manufacturing Processes~~), the particulate emissions from the Cyclone EPC-1 and Dust Auger and Silo shall be limited as follows:
16. IDEM, OAQ has decided that it is best to have the requirement of operating control equipment at all times be placed under compliance determination in the specific D conditions, and remove Condition C.6.
- G.6 ~~Operation of Equipment [326 IAC 2-7-6(6)]~~  
~~Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

17. IDEM, OAQ realizes that the specifications in Condition C.14 (Pressure Gauge and Other Instrument Specifications) can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. IDEM, OAQ has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.

**C.143 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (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~~ **When required by an condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device** shall have a scale such that the expected normal ~~maximum~~ **maximum** reading for the normal range 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 flow rate, or pH level, 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)~~ **(b)** The Permittee may request **that** the IDEM, OAQ approve the use of a ~~pressure gauge or other~~ **an** instrument that does not meet the above specifications provided the Permittee can demonstrate **that** an alternative ~~pressure gauge or other~~ instrument specification will adequately ensure compliance with permit conditions requiring the measurement of ~~pressure drop or other~~ **the** parameters.

18. IDEM, OAQ has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:

**C.176 Compliance Response Plan—Preparation, Implementation, Records, and Reports Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) ~~The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:~~
- (1) ~~Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~

~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.~~

~~The OMM Plan (or Parametric Monitoring and SMM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.~~

~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~

~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan); or~~

~~(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~

~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~

~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~

~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~

~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~

~~(3) An automatic measurement was taken when the process was not operating.~~

- ~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~
- ~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
- ~~(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:**
- (1) initial inspection and evaluation;**
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
- (1) monitoring results;**
  - (2) review of operation and maintenance procedures and records;**
  - (3) inspection of the control device, associated capture system, and the process.**
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) The Permittee shall maintain the following records:**
- (1) monitoring data;**

- (2) monitor performance data, if applicable; and**
- (3) corrective actions taken.**

19. IDEM, OAQ has clarified the Condition C.19 (Emission Statement) as follows:

**C.198** 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]

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- (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:~~
- ~~(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~
  - ~~(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.~~

**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 purpose of 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 46204-2251**

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

- ~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~

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~~Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015 **46204-2251**~~

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

- ~~(b)~~ **(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, and HDEM on

or before the date it is due.

20. Changes have been made to the record keeping and reporting requirements to reflect NSR reform provision at the major sources.

**C.2019 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]**

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- (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) **If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr)), the Permittee shall comply with following:**
- (1) **Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, document and maintain the following records:**
- (A) **A description of the project.**
- (B) **Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.**
- (C) **A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**
- (i) **Baseline actual emissions;**
- (ii) **Projected actual emissions;**
- (iii) **Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and**
- (iv) **An explanation for why the amount was excluded, and any netting calculations, if applicable.**
- (2) **Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and**
- (3) **Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.**

**C.2420 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]**

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- (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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015 **46204-2251**
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by 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, **unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.**
- (f) **If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:**
- (1) **The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx), for that regulated NSR pollutant, and**
- (2) **The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).**
- (g) **The report for a project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:**
- (1) **The name, address, and telephone number of the major stationary source.**
- (2) **The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.**

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

21. Conditions D.1.8 and D.4.3 have been revised to reflect the new condition title in Section C.16 - Response to Excursions or Exceedances.

#### D.1.8 Visible Emissions Notations

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- (a) The Permittee will conduct one visible emission notation during normal operations at least once per week for each week during which the respective boiler is operated. A trained employee or other trained observer shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee or observer is someone who has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

**If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

#### D.4.3 Visible Emissions Notations

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- (a) Weekly visible emission notations of the Cyclone EPC-1 (when venting to a baghouse) and EPBH-F, pneumatic paper dust and trim collection systems, WPC-1, WPC-2, WPCON-4, EPC-3 & EPBH-C stack exhausts, shall be performed once per week during normal daylight operations when exhausting to the atmosphere. A trained employee or other trained observer shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not

counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

**If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

- 22. Table of Contents section of the permit has been revised accordingly.

<b>Conclusion and Recommendation</b>
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The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 085-21923-00009. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.