



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: November 15, 2005
RE: Moore Wallace North America, Inc. / 151-21969-00034
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

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

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

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

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

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

Enclosures
FNPER-AM.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

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November 15, 2005

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Mr. Brian A. Hamrick
Moore Wallace North America, Inc. - Angola Plant
611 West Mill Street
Angola, Indiana 46703

Re: 151-21969-00034
First Administrative Amendment to
FESOP 151-18281-00034

Dear Mr. Hamrick:

Moore Wallace North America, Inc - Angola Plant was issued a Federally Enforceable State Operation Permit (FESOP) on April 30, 2004 for a stationary flexographic printing operation. A letter requesting changes to this permit was received on October 28, 2005. Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows:

The amendment consists of the removal of one (1) coater, identified as C3. Deleted language is indicated with strikeout and new language is indicated with bold type.

The revisions to Section A.2 Emission Units Summary and D.1 Facility Descriptions are as follows:

- (u) One (1) coater, identified as C3, constructed in 2004, with a maximum line speed of six hundred and fifty (650) feet per minute and a printing width of thirty (30) inches, exhausting to stacks # 69 and # 70.
(uv) One (1) Linerless Flexographic Printing Press, identified as Press # 68, constructed in 2005, with a maximum line speed of seven hundred and fifty (750) feet per minute and a maximum printing width of twenty (20) inches and exhausting to three (3) stacks, identified as 78, 79 and 80.

Condition D.1.3 is not practically enforceable. Therefore, it shall be removed:

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1]

Any change or modification which would increase the potential to emit of a single HAP and the combination of all HAPs greater than 10 and 25 tons per year from Lithographic Presses #51 and #71, Flexographic Presses #4, #11, #66, #67, and #68 and Coaters C2 and C3 shall obtain prior approval from IDEM, OAQ.

The remainder of Section D.1 will be revised as follows:

D.1.34 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

...

Compliance Determination Requirements

D.1.45 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

...

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

D.1.56 Record Keeping Requirements [326 IAC 12] [40 CFR 60.445(a)(h)]

- (a) ...
- (b) ...
 - (1) ...
 - (5) ...
- ~~(c) To document compliance with Condition D.1.3, the Permittee shall maintain records of the single and combined HAP usage.~~
- (cd) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

D.1.67 Reporting Requirements

...

Due to the revisions, Page 25 of this FESOP is now intentionally left blank.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact James Farrell, at (800) 451-6027, press 0 and ask for James Farrell or extension (3-8396) or dial directly: (317) 233-8396.

Sincerely,

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

Attachments

JF

cc: File – Steuben County
U.S. EPA, Region V
Steuben County Health Department
Air Compliance Section Inspector –Doyle Houser
Compliance Data Section
Administrative and Development
Technical Support and Modeling



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Moore Wallace North America, Inc – Angola Plant
611 West Mill Street,
Angola, Indiana 46703

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F151-18281-00034	
Original Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 30, 2004 Expiration Date: April 30, 2009

First Minor Permit Revision No.: 151-20451-00034, issued February 25, 2005

First Administrative Amendment No.: 151-21969-00034	Pages affected: 5, 6, 23, 24 and 25
Issued by: Original signed by Nysa L. James, Section Chief Office of Air Quality	Issuance Date: November 15, 2005 Expiration Date: April 30, 2009

- (h) One (1) flexographic printing press, identified as Press # 11, constructed in 1997, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stack # 23;
- (i) One (1) flexographic printing press, identified as Press # 34, constructed in 1996, with a maximum line speed of five hundred (500) feet per minute and a printing width of ten (10) inches, exhausting to stack # 31;
- (j) One (1) flexographic printing press, identified as Press # 35, constructed in 1996, with a maximum line speed of five hundred (500) feet per minute and a printing width of ten (10) inches, exhausting to stack # 21;
- (k) One (1) flexographic printing press, identified as Press # 48, constructed in 1986, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stack # 21;
- (l) One (1) flexographic printing press, identified as Press # 52, constructed in 1986, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stack # 21;
- (m) One (1) flexographic printing press, identified as Press # 53, constructed in 1986, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 16 and # 21;
- (n) One (1) flexographic printing press, identified as Press # 58, constructed in 1988, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stack # 22;
- (o) One (1) flexographic printing press, identified as Press # 62, constructed in 1990, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 12 and # 16;
- (p) One (1) flexographic printing press, identified as Press # 63, constructed in 1990, with a maximum line speed of five hundred (500) feet per minute and a printing width of eighteen (18) inches, exhausting to stack # 22;
- (q) One (1) flexographic printing press, identified as Press # 66, constructed in 2004, with a maximum line speed of seven hundred and fifty (750) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 75, # 76 and # 77;
- (r) One (1) flexographic printing press, identified as Press # 67, constructed in 1997, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 8, # 9 and # 10;
- (s) One (1) coater, identified as C1, constructed in 1994, with a maximum line speed of two hundred and fifty (250) feet per minute and a printing width of thirty-two (32) inches, exhausting to stack # 59;
- (t) One (1) coater, identified as C2, constructed in 2000, with a maximum line speed of two hundred and fifty (250) feet per minute and a printing width of thirty-two (32) inches, exhausting to stack # 60; and
- (u) One (1) Linerless Flexographic Printing Press, identified as Press # 68, constructed in 2005, with a maximum line speed of seven hundred and fifty (750) feet per minute and a maximum printing width of twenty (20) inches and exhausting to three (3) stacks, identified as 78, 79 and 80.

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

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

Activities emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC:

- (a) Three (3) tamaracks;
- (b) Plate wash unit;
- (c) Six (6) collators; and
- (d) Two (2) parts cleaners, installed in 1982 and 1991.

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

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

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

- (n) One (1) flexographic printing press, identified as Press # 58, constructed in 1988, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stack # 22;
- (o) One (1) flexographic printing press, identified as Press # 62, constructed in 1990, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 12 and # 16;
- (p) One (1) flexographic printing press, identified as Press # 63, constructed in 1990, with a maximum line speed of five hundred (500) feet per minute and a printing width of eighteen (18) inches, exhausting to stack # 22;
- (q) One (1) flexographic printing press, identified as Press # 66, constructed in 2004, with a maximum line speed of seven hundred and fifty (750) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 75, # 76 and # 77;
- (r) One (1) flexographic printing press, identified as Press # 67, constructed in 1997, with a maximum line speed of five hundred (500) feet per minute and a printing width of sixteen (16) inches, exhausting to stacks # 8, # 9 and # 10;
- (s) One (1) coater, identified as C1, constructed in 1994, with a maximum line speed of two hundred and fifty (250) feet per minute and a printing width of thirty-two (32) inches, exhausting to stack # 59;
- (t) One (1) coater, identified as C2, constructed in 2000, with a maximum line speed of two hundred and fifty (250) feet per minute and a printing width of thirty-two (32) inches, exhausting to stack # 60; and
- (u) One (1) Linerless Flexographic Printing Press, identified as Press # 68, constructed in 2005, with a maximum line speed of seven hundred and fifty (750) feet per minute and a maximum printing width of twenty (20) inches and exhausting to three (3) stacks, identified as 78, 79 and 80.

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

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

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

Pursuant to 326 IAC 2-8-4, the use of VOC, including inks, coatings, adhesives, release agents, additives, reducers and solvents shall be less than 67.12 tons per 12 consecutive month period for the lithographic printing, flexographic printing and coating operations combined, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 67.12 tons per 12 consecutive month period from lithographic printing, flexographic printing and the coating operations.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the volatile organic compound (VOC) content of coatings applied to labels of any substrate, or pressure sensitive tapes, or paper, plastic or metal foil by means of web coating shall be limited to 2.9 pounds VOC per gallon of coating less water delivered to the applicator.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.5 Record Keeping Requirements [326 IAC 12] [40 CFR 60.445(a)(h)]

(a) Pursuant to 60.445(a), the Permittee shall maintain a calendar month record of all coatings used and the manufacturer’s formulation data used for determining the VOC content of those coatings.

Pursuant to 60.445(h), these records shall be retained for at least two years following the date of the measurements and made available upon request of the Office of Air Quality.

(b) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water 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.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.

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

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses 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 an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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