



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant

DATE: September 6, 2007

RE: R.R. Donnelley Charlestown, Inc. / 019-23027-00041

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 03/23/06



Mitchell E. Daniels, Jr.
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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**R. R. Donnelley Charlestown, Inc.
100 Quality Court
Charlestown, Indiana 47111**

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

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

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

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

Operation Permit No.: F019-23027-00041	
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date:September 6, 2007 Expiration Date:September 6, 2012

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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 2-8-3(b)]

The Permittee owns and operates a stationary commercial printing plant.

Source Address:	100 Quality Court, Charlestown, Indiana 47111
Mailing Address:	100 Quality Court, Charlestown, Indiana 47111
General Source Phone Number:	(812) 256-3396
SIC Code:	2752
County Location:	Clark
Source Location Status:	Nonattainment for PM 2.5 and Ozone under the 8-hour ozone standard
Source Status:	Attainment for all other criteria pollutants Federally Enforceable State Operating Permit Program Minor Source, under PSD, Emission Offset Rules and Nonattainment NSR Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

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

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

- (a) One (1) Web Heatset Offset Press, referred to as C700A, constructed in June 1989, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by a thermal oxidizer system;
- (b) One (1) Web Heatset Offset Press, referred to as C700B, constructed in March 1993, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by a thermal oxidizer system;
- (c) Two (2) Web Heatset Offset Presses, referred to as C500A and C500B, both constructed in January 1992, each with a printing width of forty (40) inches and a maximum line speed of one thousand four hundred and seventy-five (1,475) feet per minute, controlled by a thermal oxidizer system;
- (d) Two (2) Web Heatset Offset Presses, referred to as C250A and C250B, both constructed in April 1994, with a printing width of thirty-six (36) inches and a maximum line speed of one thousand four hundred and sixty (1,460) feet per minute, controlled by a thermal oxidizer system;
- (e) One (1) Web Heatset Offset Press, referred to as C700C, constructed in August 1995, with a printing width of fifty-eight (58) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by a thermal oxidizer system;
- (f) One (1) Web Heatset Offset Press, referred to as C700D, constructed in February 2005, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by a thermal oxidizer system;
- (g) A thermal oxidizer system consisting of three (3) thermal oxidizers (identified as ID #19000, ID #14000, and RTO#1), with a heat input capacity of 8.1, 6.0, and 4.6 MMBtu per hour, respectively. The thermal oxidizer system is used for VOC emissions control

from C700A, C700B, C500A, C500B, C250A, C250B, C700C, and C700D. Thermal oxidizers (identified as ID #19000 and ID #14000) were constructed in 1991 and 1995 respectively, while thermal oxidizer (identified as RTO#1) is approved for construction in 2007 and will serve as the main control device once becoming fully functional.

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):

Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, and lead (Pb) emissions less than two-tenths (0.2) tons per year:

- (a) One (1) Web Non-heatset Offset Press (identified as Press 112), with a printing width of 36 inches and a maximum line speed of 790 feet per minute. This unit was constructed in January, 1973.
- (b) Film processors, plate processors, trimmers, and stitchers.
- (c) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per twelve (12) months;
- (d) Solvent recycling systems with batch capacity less than or equal to one hundred (100) gallons.
- (e) One (1) parts washer with VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day and potential, uncontrolled HAP emissions of less than five (5) pounds per day or one (1) ton of a single HAP and two and a half (2.5) tons per year of any combination of HAPs. This unit was installed prior to 1980. [326 IAC 8-3-5]
- (f) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (g) Natural gas-fired combustion sources (other than boilers) with total combined heat input equal to 2.54 million Btu per hour.

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) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, 019-23027-00041, 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, fail to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

B.9 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

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

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

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

- (a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum, the PMP's 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.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) All terms and conditions of permits established prior to F019-23027-00041 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).
- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios Federally Enforceable State Operating Permit
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ 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) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Web Heatset Offset Press, referred to as C700A, constructed in June 1989, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by a thermal oxidizer system;
- (b) One (1) Web Heatset Offset Press, referred to as C700B, constructed in March 1993, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by a thermal oxidizer system;
- (c) Two (2) Web Heatset Offset Presses, referred to as C500A and C500B, both constructed in January 1992, each with a printing width of forty (40) inches and a maximum line speed of one thousand four hundred and seventy-five (1,475) feet per minute, controlled by a thermal oxidizer system;
- (d) Two (2) Web Heatset Offset Presses, referred to as C250A and C250B, both constructed in April 1994, with a printing width of thirty-six (36) inches and a maximum line speed of one thousand four hundred and sixty (1,460) feet per minute, controlled by a thermal oxidizer system;
- (e) One (1) Web Heatset Offset Press, referred to as C700C, constructed in August 1995, with a printing width of fifty-eight (58) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by a thermal oxidizer system;
- (f) One (1) Web Heatset Offset Press, referred to as C700D, constructed in February 2005, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by a thermal oxidizer system;
- (g) A thermal oxidizer system consisting of three (3) thermal oxidizers (identified as ID #19000, ID #14000, and RTO#1), with a heat input capacity of 8.1, 6.0, and 4.6 MMBtu per hour, respectively. The thermal oxidizer system is used for VOC emissions control from C700A, C700B, C500A, C500B, C250A, C250B, C700C, and C700D. Thermal oxidizers (identified as ID #19000 and ID #14000) were constructed in 1991 and 1995 respectively, while thermal oxidizer (identified as RTO#1) is approved for construction in 2007 and will serve as the main control device once becoming fully functional.

Insignificant Activities:

- (a) One (1) Web Non-heatset Offset Press (identified as Press 112), with a printing width of 36 inches and a maximum line speed of 790 feet per minute. This unit was constructed in January 1973.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8]

- (a) Pursuant to 326 IAC 2-8 (FESOP), and in order to limit the source-wide emissions to less than 100 tons per year of VOC, the total amount of VOC delivered to all printing presses (except Press 112) plus the total amount of VOC used for cleanup shall be limited to less than 1,804 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The Permittee shall operate the thermal oxidizer system at a maximum overall control efficiency (including collection and destruction efficiency) of 95% to control VOC

emissions from printing presses C700A, C700B, C500A, C500B, C250A, C250B, C700C, and C700D.

Compliance with these limits renders the requirements of 326 IAC 2-7 (Part 70 Permit) not applicable.

D.1.2 Volatile Organic Compound (VOC) Limitations [326 IAC 8-1-6]

Pursuant to 019-6173-00041, issued December 10, 1996 and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements:

- (a) The thermal oxidizer system shall control the VOC emissions from the printing presses identified as Press C700A, C700B, C700C, C700D, C500A, C500B, C250A, and C250B at all times when the printing presses are in operation.
- (b) The overall efficiency shall be 95% for ink oil (20% VOC retention, and 100% capture of emitted VOC); 66.5% for fountain solution with alcohol substitutes (70% capture of emitted VOC); 38% for automatic blanket wash solutions with low vapor pressures, i.e. VOC composite vapor pressure of less than 10mmHg at 20 degrees Celsius (40% capture of emitted VOC).

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 and its control devices.

Compliance Determination Requirements

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

- (a) Within one hundred eighty (180) days of the startup of the 4.6 MMBtu/hr thermal oxidizer (identified as RTO#1), the Permittee shall perform a compliance stack test to determine the minimum operating temperature that will achieve a 95% VOC destruction efficiency for the oxidizer, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Upon re-starting the 6.0 MMBtu/hr thermal oxidizer 14000, the Permittee shall perform a compliance stack test, to determine the minimum operating temperature that will achieve a 95% VOC destruction efficiency for the oxidizer, utilizing methods as approved by the Commissioner. This test shall be repeated once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.
- (c) Upon re-starting the 8.1 MMBtu/hr thermal oxidizer 19000, the Permittee shall perform a compliance stack test, to determine the minimum operating temperature that will achieve a 95% VOC destruction efficiency for the oxidizer, utilizing methods as approved by the Commissioner. This test shall be repeated once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

D.1.5 Thermal Oxidizer Temperature [326 IAC 8-1-6]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer system (identified as ID #19000, ID #14000, and RTO#1) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate each thermal oxidizer at or above the 3-hour average temperature of 1400°F. A 3-hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances shall be considered a deviation from this

permit.

- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring

- (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.1.1, 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.

D.1.7 VOC Control

- (a) The press dryers used in conjunction with each printing press shall be operated at a negative pressure, where no visible emissions of the condensed oil can be seen exiting the dryer. Demonstration of the negative pressure shall be verified using a smoke stick or strips of aluminum foil at all inlets to the dryer.
- (b) During web breaks or shut down activities, the press dryers used in conjunction with each press, shall be allowed to operate at printing room temperature as room air and duct air is ducted to the thermal oxidizer in operation.
- (c) The automatic blanket wash materials used shall have a VOC composite vapor pressure less than 10 mm Hg at 20°C and the fountain solution used shall be alcohol-free.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.
 - (1) The VOC content of material and solvent used less water.
 - (2) The amount of material and solvent used on a 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.

- (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 as stated below and shall be complete and sufficient to establish compliance with Conditions D.1.1 and D.1.2.
- (1) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, as applicable.
 - (2) Records of the VOC composite vapor pressure of the automatic blanket wash materials. Records shall also be maintained of the fountain solutions that were used and if they were alcohol based.
 - (3) The VOC destruction efficiency of the thermal oxidizer system; and
 - (4) The continuous temperature records for each of the thermal oxidizers and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (5) Daily records of the duct pressure or fan amperage.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 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).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

Insignificant Activities

- (f) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(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.2.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(c) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions rate from the trimmers, which have a maximum process weight rate less than 100 pounds per hour, shall not exceed five hundred fifty-one thousandths (0.551) pounds per hour.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

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

Insignificant Activities

- (e) One (1) parts washer with VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day and potential, uncontrolled HAP emissions of less than five (5) pounds per day or one (1) ton of a single HAP and two and a half (2.5) tons per year of any combination of HAPs. This unit was installed prior to 1980. [326 IAC 8-3-5]

(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.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

- (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: R. R. Donnelley Charlestown, Inc.
Source Address: 100 Quality Court, Charlestown, Indiana 47111
Mailing Address: 100 Quality Court, Charlestown, Indiana 47111
FESOP Permit No.: 019-23027-00041

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: R. R. Donnelley Charlestown, Inc.
Source Address: 100 Quality Court, Charlestown, Indiana 47111
Mailing Address: 100 Quality Court, Charlestown, Indiana 47111
FESOP Permit No.: 019-23027-00041

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: R. R. Donnelley Charlestown, Inc.
Source Address: 100 Quality Court, Charlestown, Indiana 47111
Mailing Address: 100 Quality Court, Charlestown, Indiana 47111
FESOP Permit No.: 019-23027-00041
Facility: Printing Presses (C700A, C700B, C700C, C700D, C500A, C500B, C250A, C250B)
Parameter: VOC Usage
Limit: Less than 1,804 tons per 12 consecutive month period, with compliance determined at the end of each month

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

Source Name: R. R. Donnelley Charlestown, Inc.
Source Address: 100 Quality Court, Charlestown, Indiana 47111
Mailing Address: 100 Quality Court, Charlestown, Indiana 47111
FESOP Permit No.: 019-23027-00041

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**Addendum to the Technical Support Document
For a Federally Enforceable State Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name:	R. R. Donnelley Charlestown, Inc.
Source Location:	100 Quality Court, Charlestown, Indiana 47111
County:	Clark
SIC Code:	2752
Operating Permit No.:	F019-12729-00041
Operating Permit Issuance Date:	February 22, 2002
Permit Renewal No.:	F019-23027-00041
Permit Reviewer:	ERG/JR

On June 23, 2007, the Office of Air Quality (OAQ) had a notice published in the Evening News of Jeffersonville, Indiana stating that R. R. Donnelley Charlestown, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to continue to operate a stationary commercial printing plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments on the draft permit were submitted by Jessica Ortiz, EHS Professional for R. R. Donnelley. Changes made as a result of these comments are shown in this addendum. New language is in **bold** while deleted language is in ~~strikeout~~. The Table of Contents has been updated as necessary.

Comment 1:

The Permittee requests that the word "oxdizer" be spelled correctly and revised to "oxidizer" in Facility Descriptions A.2(g) and D.1(g).

Response to Comment 1:

IDEM, OAQ agrees. The following changes have been made to the permit as a result of this comment:

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

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

...

- (g) A thermal oxidizer system consisting of three (3) thermal oxidizers (identified as ID #19000, ID #14000, and RTO#1), with a heat input capacity of 8.1, 6.0, and 4.6 MMBtu per hour, respectively. The thermal ~~oxidizer~~ **oxidizer** system is used for VOC emissions control from C700A, C700B, C500A, C500B, C250A, C250B, C700C, and C700D. Thermal oxidizers (identified as ID #19000 and ID #14000) were constructed in 1991 and 1995 respectively, while thermal oxidizer (identified as RTO#1) is approved for construction in 2007 and will serve as the main control device once becoming fully functional.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

- (g) A thermal oxidizer system consisting of three (3) thermal oxidizers (identified as ID #19000, ID #14000, and RTO#1), with a heat input capacity of 8.1, 6.0, and 4.6 MMBtu per hour, respectively. The thermal oxidizer system is used for VOC emissions control from C700A, C700B, C500A, C500B, C250A, C250B, C700C, and C700D. Thermal oxidizers (identified as ID #19000 and ID #14000) were constructed in 1991 and 1995 respectively, while thermal oxidizer (identified as RTO#1) is approved for construction in 2007 and will serve as the main control device once becoming fully functional.

...

Comment 2:

The Permittee requests the facility description of the parts washer in A.3(e) and D.3(e) be revised. The current description unnecessarily and inappropriately includes a solvent usage limitation that has no regulatory basis. In addition, the Permittee requests to renumber the reference of the facility description from D.2(f) to D.2(a), and D.3(e) to D.3(a). Also, the Permittee requests that the word "stichers" be changed to "stitchers" in A.3(b).

Response to Comment 2:

The reference to "60 gallons per year" included in the description of the parts washer in Condition A.3(e) of the draft FESOP was not a limit as suggested by the Permittee. As stated in the paragraph at the beginning of Section A, the information contained in Condition A.3 "... is descriptive information and does not constitute enforceable conditions." In order to meet the definition of an insignificant activity in 326 IAC 2-7-1(21), the VOC emissions for this unit must be less than 3 pounds per hour or 15 pounds per day and the HAP emissions must be less than 5 pounds per day or 1 ton per year for each single HAP and less than 12.5 pounds per day or 2.5 tons per year for total combined HAPs. Therefore, IDEM, OAQ revised the description of the parts washer in Condition A.3(e) to match the insignificant activity definitions in 326 IAC 2-7-1(21)(A)(iv) and 326 IAC 2-7-1(21)(c). IDEM, OAQ disagrees with renumbering the facility reference from D.2(f) to D.2(a), and D.3(e) to D.3(a) because Section A.3 lists the trimmers under (f) and not (a) and Section A.3 lists the parts washer under (e) and not (a). Section A.3(b) has been revised as requested.

The following changes have been made to the permit as a result of this comment:

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):

...

- (b) Film processors, plate processors, trimmers, and ~~stichers~~ **stitchers**.

...

- (e) One (1) parts washer with **VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day and potential, uncontrolled HAP emissions of less than five (5) pounds per day or one (1) ton of a single HAP and two and a half (2.5) tons per year of any combination of HAPs.** ~~maximum usage rate of 60 gallons of non-halogenated solvent per year.~~ This unit was installed prior to 1980. [326 IAC 8-3-5]

...

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

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

Insignificant Activities

- (e) One (1) parts washer with **VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day and potential, uncontrolled HAP emissions of less than five (5) pounds per day or one (1) ton of a single HAP and two and a half (2.5) tons per year of any combination of HAPs.** ~~maximum usage rate of 60 gallons of non-halogenated solvent per year.~~
This unit was installed prior to 1980. [326 IAC 8-3-5]

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

Comment 3:

The Permittee requests the facility description of the combustion sources in Condition A.3(g) be revised because the description unnecessarily and inappropriately includes a heat input limitation that has no regulatory basis.

Response to Comment 3:

The reference to heat input included in the description of the combustion sources in Condition A.3(g) of the draft FESOP was not a limit as suggested by the Permittee. As stated in the paragraph at the beginning of Section A, the information contained in Condition A.3 "... is descriptive information and does not constitute enforceable conditions." IDEM, OAQ disagrees that the heat input limitation is not necessary for the insignificant activity description. All units have to be included to determine compliance with FESOP thresholds. No change has been made to the permit as a result of this comment.

Comment 4:

Condition C.11 should be revised because it incorrectly cites requirements for continuous emission monitoring systems (CEMS) and the current FESOP requires no CEMS (nor is there a regulatory basis for including such requirements).

Response to Comment 4:

The Permittee is not required to operate CEMS; therefore, Condition C.11 has been removed. The following change has been made to the permit as a result of this comment and subsequent conditions have been renumbered.

~~C.11 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]~~

- ~~(a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.~~
- ~~(b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.~~
- ~~(c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.~~

- (d) ~~Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 8-1-6.~~

Comment 5:

Conditions D.1.1, D.1.2, and D.2.1 contain references to F019-12729-00041. Since Condition B.13 states that all terms and conditions from previous permits are superseded by this permit, the Permittee requests that IDEM remove the references to the previous FESOP.

Response to Comment 5:

IDEM, OAQ agrees that it is unnecessary to reference FESOP 019-12729-00041 in Conditions D.1.1 and D.2.1. However, because the 326 IAC 8-1-6 BACT determination was made enforceable by FESOP 019-6173-00041, issued on December 10, 1996; and in order to correctly reference the BACT determination, IDEM, OAQ has revised Condition D.1.2.

The following changes have been made to the permit as a result of this comment. Additionally, the word "Celcius" has been revised to correct a spelling error.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8]

- (a) Pursuant to ~~F019-12729-00041, issued February 22, 2002,~~ 326 IAC 2-8 (FESOP), and in order to limit the source-wide emissions to less than 100 tons per year of VOC, the total amount of VOC delivered to all printing presses (except Press 112) plus the total amount of VOC used for cleanup shall be limited to less than 1,804 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

D.1.2 Volatile Organic Compound (VOC) Limitations [326 IAC 8-1-6]

Pursuant to ~~F019-12729-00041~~ **019-6173-00041**, issued ~~February 22, 2002~~ **December 10, 1996** and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements:

...

- (b) The overall efficiency shall be 95% for ink oil (20% VOC retention, and 100% capture of emitted VOC); 66.5% for fountain solution with alcohol substitutes (70% capture of emitted VOC); 38% for automatic blanket wash solutions with low vapor pressures, i.e VOC composite vapor pressure of less than 10mmHg at 20 degrees ~~Celcius~~ **Celsius** (40% capture of emitted VOC).

D.2.1 Particulate Matter (PM)

Pursuant to ~~F019-12729-00041, issued February 22, 2002,~~ and 326 IAC 6-3-2(c) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions rate from the trimmers, which have a maximum process weight rate less than 100 pounds per hour, shall not exceed five hundred fifty-one thousandths (0.551) pounds per hour.

Comment 6:

The Permittee requests that IDEM, OAQ remove the testing requirements for thermal oxidizers 19000 and 14000. The new regenerative thermal oxidizer (RTO #1) will serve as the primary control device once it is installed and fully operational. Thermal oxidizer 14000 will have limited, temporary operation as an emergency backup for RTO#1. Thermal oxidizer 19000 is planned to no longer be used at the facility. Given the limited usage of thermal oxidizer 14000 as a backup, periodic performance testing is not warranted.

Response to Comment 6:

On March 28, 2007, the Permittee was issued Administrative Amendment 019-24216-00041 approving the construction and operation of the new regenerative thermal oxidizer (RTO #1) as well as the replacement of the existing thermal oxidizers (14000 and 19000). After public notice of this permit, the Permittee informed IDEM, OAQ that RTO #1 has begun operating and the

thermal oxidizers 14000 and 19000 have been shutdown (with the intent that 14000 will still be used as backup and 19000 will be dismantled). IDEM, OAQ agrees to remove the testing language that requires thermal oxidizers 14000 and 19000 be tested within five (5) years of the last compliant stack test. However, IDEM, OAQ will require that these thermal oxidizers (14000 and 19000) be tested within one hundred eighty (180) days upon restart for use as a backup thermal oxidizer.

The following changes have been made to the permit as a result of this comment. Additionally, IDEM, OAQ is revising the referenced citation of Condition D.1.4 to reflect the appropriate authority.

D.1.4 Testing Requirements ~~[326 IAC 2-7-6(1),(6)] [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]~~

- (a) ~~Within five (5) years of the last compliant stack test, the Permittee shall perform a compliance stack test for the 8.1 MMBtu/hr thermal oxidizer and 6.0 MMBtu/hr thermal oxidizer (identified as ID #19000 and ID #14000), to determine the minimum operating temperature that will achieve a 95% VOC destruction efficiency for each oxidizer, utilizing methods as approved by the Commissioner. This test shall be repeated once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.~~
- (ba) Within one hundred eighty (180) days of the startup of the 4.6 MMBtu/hr thermal oxidizer (identified as RTO#1), the Permittee shall perform a compliance stack test to determine the minimum operating temperature that will achieve a 95% VOC destruction efficiency for the oxidizer, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) **Upon re-starting the 6.0 MMBtu/hr thermal oxidizer 14000, the Permittee shall perform a compliance stack test, to determine the minimum operating temperature that will achieve a 95% VOC destruction efficiency for the oxidizer, utilizing methods as approved by the Commissioner. This test shall be repeated once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.**
- (c) **Upon re-starting the 8.1 MMBtu/hr thermal oxidizer 19000, the Permittee shall perform a compliance stack test, to determine the minimum operating temperature that will achieve a 95% VOC destruction efficiency for the oxidizer, utilizing methods as approved by the Commissioner. This test shall be repeated once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.**

Comment 7:

The Permittee requests Condition D.1.5(a) be revised such that the output of the operating temperature of the thermal oxidizer system not be recorded as a 3-hour average because this can be burdensome since the computer system used to record the temperature documents the temperature on a more frequent basis.

Response to Comment 7:

IDEM, OAQ disagrees with the Permittee's request to remove the requirement that the output of temperature recording system be recorded as a 3-hour average. In order to demonstrate compliance with 326 IAC 2-8 and 326 IAC 8-1-6, the Permittee must maintain continuous temperature records for the thermal oxidizers; however, the 3-hour average temperatures are used to determine compliance (see 326 IAC 8-1-12(b)(6)(ii)).

In order to clarify Conditions D.1.5 and D.1.8(b)(4), IDEM, OAQ revised these conditions as shown below. No other changes have been made to the permit as a result of this comment.

D.1.5 Thermal Oxidizer Temperature [326 IAC 8-1-6]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer system (identified as ID #19000, ID #14000, and RTO#1) for measuring operating temperature. **For the purpose of this condition, continuous means no less than once per minute.** The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate each thermal oxidizer at or above the 3-hour average temperature of 1400°F. A 3-hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test **that demonstrates compliance with limits in Conditions D.1.1 and D.1.2, as approved by IDEM.**

...

D.1.8 Record Keeping Requirements

...

- (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 as stated below and shall be complete and sufficient to establish compliance with Conditions **D.1.1 and D.1.2**.
- ...
- (4) The continuous temperature records ~~(on a 3-hour average basis)~~ for each **of the thermal oxidizers** and the **3-hour average** temperature used to demonstrate compliance during the most recent compliant stack test.

...

Comment 8:

Condition D.1.6 contains parametric monitoring requirements that provide no information regarding the performance of the add-on control system. The Permittee requests that Condition D.1.6 and the associated recordkeeping requirement (Condition D.1.8(b)(5)) be deleted. This issue has been raised with IDEM numerous times in the past and the agency has failed to provide any rationale for these requirements.

Response to Comment 8:

IDEM, OAQ feels that the specific monitoring requirement in the permit regarding duct pressure and fan amperage associated with the thermal oxidizer is needed to ensure the thermal oxidizer is achieving the necessary overall control efficiency. Monitoring the duct pressure and fan amperage is important for determining the proper operation of the control equipment and for determining whether emissions are being collected and sent to the thermal oxidizer. The Permittee is required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal under Condition C.15 - Response to Excursions or Exceedances. This condition ensures 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.

No changes were made to the permit as a result of this comment.

Comment 9:

Condition D.1.7(a) contains duplicative language to Condition D.1.7(b). The Permittee requests the duplicated language in Condition D.1.7(a) be removed. Additionally, the Permittee requests

that the title of Condition D.1.7 be revised to something more general because the conditions do not all solely pertain to the press drying operations.

Response to Comment 9:

IDEM, OAQ agrees to change Condition D.1.7(a). The condition heading has been revised from "Press Drying Operation" to "VOC Control".

The following changes have been made to the permit as a result of this comment:

D.1.7 ~~Press Drying Operation~~ VOC Control

(a) The press dryers used in conjunction with each printing press shall be operated at a negative pressure, where no visible emissions of the condensed oil can be seen exiting the dryer. Demonstration of the negative pressure shall be verified using a smoke stick or strips of aluminum foil at all inlets to the dryer. ~~During web breaks or shut-down activities, the dryers shall be allowed to operate at printing room pressure as room air and dryer air is ducted to the operating oxidizer.~~

...

Comment 10:

The Permittee differentiates between solvents added to inks and those used as cleanup solvents. Conditions D.1.8(a)(2)(B) and D.1.8(a)(3) should be deleted because the conditions can be incorporated into Condition D.1.8(a)(2) by adding the word "each" after "The amount of".

Response to Comment 10:

IDEM, OAQ disagrees that Condition D.1.8(a)(2) and (3) should be revised as requested by the source. IDEM, OAQ prefers to differentiate between solvent used as cleanup and those added to coatings. No change has been made to the permit as a result of this comment.

Comment 11:

The Permittee requests that IDEM, OAQ add the citation 326 IAC 2-8-4(1) to the heading of the Emission Limitations and Standards as part of Section D.3.

Response to Comment 11:

IDEM, OAQ agrees. The following change has been made to the permit as a result of this comment:

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

...

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

Comment 12:

The printing press identified as PRESS112 is not associated with the VOC usage limit; therefore, it should be removed from the quarterly reporting form.

Response to Comment 12:

IDEM, OAQ agrees. The following change has been made to the permit as a result of this comment:

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

FESOP Quarterly Report

Source Name: R. R. Donnelley Charlestown, Inc.
Source Address: 100 Quality Court, Charlestown, Indiana 47111
Mailing Address: 100 Quality Court, Charlestown, Indiana 47111
FESOP Permit No.: 019-23027-00041
Facility: Printing Presses (C700A, C700B, C700C, C700D, ~~PRESS112~~, C500A, C500B,
C250A, C250B)
Parameter: VOC Usage
Limit: Less than 1,804 tons per 12 consecutive month period, with compliance
determined at the end of each month

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	R. R. Donnelley Charlestown, Inc.
Source Location:	100 Quality Court, Charlestown, Indiana 47111
County:	Clark
SIC Code:	2752
Operating Permit No.:	F019-12729-00041
Operating Permit Issuance Date:	February 22, 2002
Permit Renewal No.:	F019-23027-00041
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a FESOP Renewal application from R. R. Donnelley Charlestown, Inc. relating to the operation of a stationary commercial printing plant.

History

On April 25, 2006, the Permittee submitted an application to IDEM, OAQ requesting approval for the renewal of a Federally Enforceable State Operating Permit for an existing stationary commercial printing plant located at 100 Quality Court, Charlestown, Indiana.

The Permittee was issued a FESOP No.: 019-12729-00041 on February 22, 2002, which limited the source-wide potential to emit of VOC to less than 100 tons per year pursuant to the provisions of 326 IAC 2-8.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Web Heatset Offset Press, referred to as C700A, constructed in June 1989, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by a thermal oxidizer system;
- (b) One (1) Web Heatset Offset Press, referred to as C700B, constructed in March 1993, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by a thermal oxidizer system;
- (c) Two (2) Web Heatset Offset Presses, referred to as C500A and C500B, both constructed in January 1992, each with a printing width of forty (40) inches and a maximum line speed of one thousand four hundred and seventy-five (1,475) feet per minute, controlled by a thermal oxidizer system;
- (d) Two (2) Web Heatset Offset Presses, referred to as C250A and C250B, both constructed in April 1994, with a printing width of thirty-six (36) inches and a maximum line speed of one thousand four hundred and sixty (1,460) feet per minute, controlled by a thermal oxidizer system;
- (e) One (1) Web Heatset Offset Press, referred to as C700C, constructed in August 1995, with a printing width of fifty-eight (58) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by a thermal oxidizer system;

- (f) One (1) Web Heatset Offset Press, referred to as C700D, constructed in February 2005, with a printing width of sixty-six (66) inches and a maximum line speed of two thousand three hundred (2,300) feet per minute, controlled by a thermal oxidizer system;
- (g) A thermal oxidizer system consisting of three (3) thermal oxidizers (identified as ID #19000, ID #14000, and RTO#1), with a heat input capacity of 8.1, 6.0, and 4.6 MMBtu per hour, respectively. The thermal oxidizer system is used for VOC emissions control from C700A, C700B, C500A, C500B, C250A, C250B, C700C, and C700D. Thermal oxidizers (identified as ID #19000 and ID #14000) were constructed in 1991 and 1995 respectively, while thermal oxidizer (identified as RTO#1) is approved for construction in 2007 and will serve as the main control device once becoming fully functional.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Insignificant Activities

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

Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, and lead (Pb) emissions less than two-tenths (0.2) tons per year:

- (a) One (1) Web Non-heatset Offset Press (identified as Press 112), with a printing width of 36 inches and a maximum line speed of 790 feet per minute. This unit was constructed in January 1973.
- (b) Film processors, plate processors, trimmers, and stichers.
- (c) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per twelve (12) months;
- (d) Solvent recycling systems with batch capacity less than or equal to one hundred (100) gallons.
- (e) One (1) parts washer with maximum usage rate of 60 gallons of non-halogenated solvent per year. This unit was installed prior to 1980. [326 IAC 8-3-5]
- (f) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (g) Natural gas-fired combustion sources (other than boilers) with total combined heat input equal to 2.54 million Btu per hour.

Existing Approvals

The source has been operating under previous FESOP No. 019-12729-00041, issued on February 22, 2002, with an expiration date of February 22, 2007, and the following amendments and revisions:

- (a) First Administrative Amendment No. 019-16907-00041, issued January 10, 2003.

- (b) Second Administrative Amendment No. 019-19254-00041, issued September 13, 2004.
- (c) Third Administrative Amendment No. 019-20466-00041, issued December 29, 2004.
- (d) Fourth Administrative Amendment No. 019-21887-00041, issued October 25, 2005.
- (e) Fifth Administrative Amendment No. 019-22040-00041, issued December 7, 2005.
- (f) Sixth Administrative Amendment No. 019-24216-00041, issued February 27, 2007.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on April 25, 2006. Additional information was received on November 2, 2005, and March 1, 2007.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 4).

Unrestricted Potential Emissions

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

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	0.04
PM10	0.18
SO ₂	0.01
VOC	>100
CO	1.95
NO _x	2.32

HAPs	Unrestricted Potential Emissions (tons/year)
Napthalene	4.92
1,2,4-Trimethylbenzene	0.95
Benzene	4.867E-05
Dichlorobenzene	2.78E-05
Formaldehyde	1.74E-03
Hexane	4.17E-02
Toluene	7.88E-05
Glycol Ether	5.52
Total	11.4

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable

only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Eight (8) Printing Presses	0.0	0.0	0.0	Less than 90.2	0.0	0.0	11.4
Press 112	0.0	0.0	0.0	1.12	0.0	0.0	0.0
Trimmers	2.41	2.41	0.0	0.0	0.0	0.0	0.0
Parts Washer	0.0	0.0	0.0	3.3	0.0	0.0	0.0
Total	2.41	2.41	0.0	95.0	0.0	0.0	11.4

County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Clark County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements for Nonattainment New Source Review. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (c) Clark County has been classified as attainment 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. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	<100
PM10	<100
SO ₂	<100
VOC	<100

Pollutant	Emissions (tons/year)
CO	<100
NO _x	<100
Single HAP	<10
Combination HAPs	<25

- (a) This existing source is not a major stationary source under PSD because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This existing source is not a major stationary source under Emission Offset because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year.

Federal Rule Applicability

- (a) The provisions of 40 CFR Part 60, Subpart E - Standards of Performance for Incinerators are not included in the permit for this source because the thermal oxidizers do not meet the definition of an incinerator as per the provisions of 40 CFR 60.51. The oxidizers at this source are used as a control device for VOC emissions and not for burning municipal waste.
- (b) The provisions of 40 CFR 60, Subpart QQ - Standards of Performance for the Graphics Arts Industry: Publication Rotogravure Printing (326 IAC 12) are not included in the permit for this source because the Permittee does not use rotogravure printing presses.
- (c) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR 60) provisions included in the permit for this source.
- (d) The provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry (326 IAC 20-18) are not included in the permit for this source because this source is not located at a major source of hazardous air pollutants (HAPs) and this source does not use rotogravure or wide-web flexographic printing presses.
- (e) The provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (326 IAC 20-65) are not included in the permit for this source because this source is not located a major source of HAPs and the NESHAP source category does not include lithographic printing processes [40 CFR 63.3300(c)].
- (f) The provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart T - National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning are not included in this permit because this source does not use a halogenated solvent in the one (1) parts washer.
- (g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) provisions included in the permit for this source.

State Rule Applicability – Entire Source

326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment New Source Review)

Clark County has been designated as nonattainment for the PM_{2.5} and 8-hour ozone standards.

- (a) Clark County has been designated as nonattainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM_{2.5} Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source's PM₁₀ emissions represent PM_{2.5} emissions. IDEM will use the PM₁₀ nonattainment major NSR program as a surrogate to

address the requirements of nonattainment major NSR for the PM_{2.5} NAAQS. A major source in a nonattainment area is defined as a source that emits or has the potential to emit 100 tons per year of any nonattainment pollutant. R. R. Donnelley Charlestown, Inc. has a potential to emit of PM₁₀ below 100 tons per year. Therefore, assuming that PM₁₀ emissions represent PM_{2.5} emissions, the Nonattainment NSR rules do not apply.

- (b) The source-wide potential to emit of VOC is limited to less than 100 tons per year pursuant to 326 IAC 2-8 (FESOP). The potential to emit of NO_x is less than 100 tons per year. Therefore, the provisions of 326 IAC 2-3 (Emission Offset) do not apply.

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

This source is not in 1 of the 28 source categories and has been operating under the provisions of 326 IAC 2-8 (FESOP) since 1996 when it was issued a FESOP (No.: F019-6173-00041 on December 10, 1996). A FESOP Renewal No.: F019-12729-00041 was issued to the source on February 22, 2002, with an expiration date of February 22, 2007.

On April 25, 2006, the Permittee submitted an application to IDEM, OAQ requesting to continue to operate their existing commercial printing plant under the provisions of 326 IAC 2-8 (FESOP). Since the potential to emit all regulated pollutants is less than 250 tons per year, this source is a minor source under 326 IAC 2-2 (PSD) and the provisions of 326 IAC 2-2 (PSD) do not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The potential to emit of single HAP and combination of HAPs from the operation of this stationary commercial printing plant is less than 10 and 25 tons per year, respectively. Therefore, the provisions of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Clark County and is not required to operate under a Part 70 permit, and has potential to emit of lead (Pb) less than five (5) tons per year. Therefore, this source is not subject to the annual or triennial reporting. However, pursuant to 326 IAC 2-6-1(b), this source is subject to additional information requests as provided in 326 IAC 2-6-5.

326 IAC 2-8 (Federally Enforceable State Operating Permit (FESOP))

- (a) Pursuant to F019-12729-00041, issued February 22, 2002, 326 IAC 2-8 (FESOP), and in order to limit the source to less than 100 tons per year of VOC, the amount of VOC delivered to all printing presses (except press 112) plus the amount of VOC used for cleanup shall be limited to less than 1,804 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The Permittee shall operate the thermal oxidizer system at a minimum overall control efficiency (including collection and destruction efficiency) of 95% control VOC emissions from printing presses C700A, C700B, C500A, C500B, C250A, C250B, C700C, and C700D.

Note: The potential VOC emissions from press 112, listed under Insignificant Activities are equal to 1.12 tons per year. This press is not controlled by the thermal oxidizer and the PTE is not limited by this permit. The above limit restricts VOC emissions to less than 91 tons per year, thereby allowing approximately four (4) tons of VOC from the insignificant activities.

Compliance with the above limit renders the requirements of 326 IAC 2-7 (Part 70 Permit) not applicable.

326 IAC 6-4 (Fugitive Dust Emissions)

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.

326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations)

This source is not subject to the provisions of 326 IAC 6-5 because the potential fugitive

particulate matter emissions from paved roads and parking lots are negligible.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The provisions of 326 IAC 8-6 (Organic Solvent Emission Limitations) do not apply to this source because this source did not commence its operation after October 7, 1974 and prior to January 1, 1980. This source was constructed after 1980.

326 IAC 5-1 (Opacity Limitations)

This source is located in Jeffersonville Township. Therefore, pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

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

State Rule Applicability – Printing Presses (C700A, C700B, C500A, C500B, C250A, C250B, C700C, and C700D)

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

The provisions of 326 IAC 6-3-2 do not apply to the printing presses at this source because the operations do not result in any particulate emissions.

326 IAC 6.5-1 (Particulate Matter Limitations Except for Lake County)

The provisions of 326 IAC 6.5-1 (Particulate Matter Limitations Except for Lake County) do not apply to this source located in Clark County because it does not have particulate emissions greater than 100 tons per year or actual emissions of ten (10) tons or more per year.

326 IAC 6.5-2 (Particulate Matter Limitations for Clark County)

The provisions of 326 IAC 6.5-2 (Particulate Matter Limitations for Clark County) do not apply because this source is not specifically listed in 326 IAC 6.5-2.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The requirements of 326 IAC 8-1-6 are applicable to the printing presses (identified as C700A, C700B, C700C, C700D, C500A, C500B, C250A, and C250B because these presses were constructed or modified after January 1, 1980, the applicability date for this rule and have potential VOC emissions equal to greater than twenty-five (25) tons of VOCs per year. Therefore, pursuant to F019-12729-00041, issued February 22, 2002 and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), BACT is determined to be the following:

- (a) The thermal oxidizer system shall control the VOC emissions from the printing presses identified as Press C700A, C700B, C700C, C700D, C500A, C500B, C250A, and C250B at all times when the printing presses are in operation.
- (b) The overall efficiency shall be 95% for ink oil (20% VOC retention, and 100% capture of emitted VOC); 66.5% for fountain solution with alcohol substitutes (70% capture of emitted VOC); 38% for automatic blanket wash solutions with low vapor pressures, i.e. VOC composite vapor pressure of less than 10mmHg at 20 degree Celcius (40% capture of emitted VOC).

326 IAC 8-5-5 (Graphic Arts Operations)

The provisions of 326 IAC 8-5-5 (Graphic Arts Operations) do not apply to this source because this rule applies to publication rotogravure, packaging rotogravure, and flexographic printing presses. The printing presses at the source are all web heatset offset and nonheatset offset lithographic printing presses.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)
The provisions of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) do not apply to this source because the source has limited the VOC emissions to less than 100 tons per year threshold pursuant to 326 IAC 2-8 (FESOP).

State Rule Applicability – One (1) Web Non-heatset Offset Press (Press 112)

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The requirements of 326 IAC 8-1-6 are not applicable to the web non-heatset offset press (identified as Press 112) because this press was constructed before January 1, 1980, the applicability date for this rule.

326 IAC 8-5-5 (Graphic Arts Operations)
The provisions of 326 IAC 8-5-5 (Graphic Arts Operations) do not apply to the web non-heatset offset press (identified as Press 112) because this rule applies to publication rotogravure, packaging rotogravure, and flexographic printing presses. Press 112 is a lithographic press.

326 IAC 8-2-5 (Paper Coating Operations)
The provisions of 326 IAC 8-2-5 (Paper Coating Operations) do not apply to the web non-heatset offset press (identified as Press 112) because it is used for applying non-pigmented ink to printed products and does not involve web coating or saturation processes of paper, plastic, metal foil, and pressure sensitive tapes and labels regardless of substrate.

State Rule Applicability – Trimmers

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(c), the allowable particulate emissions rate from the trimmers which have a maximum process weight rate less than 100 pounds per hour shall not exceed five hundred fifty-one thousandths (0.551) pounds per hour.

State Rule Applicability – Parts Washer

326 IAC 8-3 (Organic Solvent Degreasing Operations)

- (a) The provisions of 326 IAC 8-3-2 (Cold Cleaner Operations) do not apply to the parts washer. This unit was installed prior to January 1, 1980 in Clark County. However, the organic solvent degreasing unit is located at a source which has potential emissions of VOC less than 100 tons per year pursuant to the limits under 326 IAC 2-8 (FESOP).
- (b) The provisions of 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) applies to the parts washer because this unit is existing as of July 1, 1990 and the source is located in Clark County. Pursuant to the provisions of this rule:
 - (1) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (A) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (i) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38 degrees C) (one hundred degrees Fahrenheit (100 degrees F));
 - (ii) The solvent is agitated; or
 - (iii) The solvent is heated.

- (B) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 degrees C) (one hundred degrees Fahrenheit (100 degrees F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (C) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (D) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (E) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 degrees C) (one hundred degrees Fahrenheit (100 degrees F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9 degrees C) (one hundred twenty degrees Fahrenheit (12 degrees F)):
 - (i) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (ii) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (iii) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (2) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (A) Close the cover whenever articles are not being handled in the degreaser.
 - (B) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (C) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

State Rule Applicability – Natural Gas-Fired Combustion Units

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

The natural gas-fired heating combustion units at the source are not subject to the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because according to 326 IAC 6-3-1(b)(14) manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are exempt from the provisions of this rule.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The natural gas-fired heating combustion units at the source are not subject to the provisions of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because these units are not indirect heating units.

Testing Requirements

- (a) Within five (5) years of the last compliant stack test, the Permittee shall perform a compliance stack test for the 8.1 MMBtu/hr thermal oxidizer and 6.0 MMBtu/hr thermal oxidizer (identified as ID #19000 and ID #14000), to determine the minimum operating temperature that will achieve a 95 % VOC destruction efficiency for each oxidizer, utilizing methods as approved by the Commissioner. This test shall be repeated once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

A stack test for existing thermal oxidizers, identified as ID #19000 and ID #14000, was conducted March 7, 2006 and March 8, 2006. This is currently pending verification and approval by the Compliance Determination section at IDEM, OAQ.

- (b) Within one hundred eighty (180) days of the startup of the 4.6 MMBtu/hr thermal oxidizer (identified as RTO#1), the Permittee shall perform a compliance stack test to determine the minimum operating temperature that will achieve a 95% VOC destruction efficiency for the oxidizer, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Requirements

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

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

The compliance determination and monitoring requirements applicable to the printing presses at this source are as follows:

1. Thermal Oxidizer Temperature [326 IAC 8-1-6]
 - (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer system (identified as ID #19000, ID #14000, and RTO#1) for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate each thermal oxidizer at or above the 3-hour average temperature of 1400°F. A 3-hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and

Exceedances shall be considered a deviation from this permit.

- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test.
- (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-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances shall be considered a deviation from this permit.

2. Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test.
- (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.

3. Press Drying Operation

- (a) The press dryers used in conjunction with each printing press shall be operated at a negative pressure, where no visible emissions of the condensed oil can be seen exiting the dryer. Demonstration of the negative pressure shall be verified using a smoke stick or strips of aluminum foil at all inlets to the dryer. During web breaks or shut down activities, the dryers shall be allowed to operate at printing room pressure as room air and dryer air is ducted to the operating oxidizer.
- (b) During web breaks or shut down activities, the press dryers used in conjunction with each press, shall be allowed to operate at printing room temperature as room air and duct air is ducted to the thermal oxidizer in operation.
- (c) The automatic blanket wash materials used shall have a VOC composite vapor pressure less than 10 mm Hg at 20°C and the fountain solution used shall be alcohol-free.

These requirements are necessary to ensure compliance with the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this stationary commercial printing plant shall be subject to the conditions of the FESOP Renewal No. 019-23027-00041.

**Appendix A: Emission Calculations
Emissions from Natural Gas Combustion
(Space Heaters and Air-Makeup Units)**

Company Name: R.R. Donelley Charlestown, Inc.
Address: 100 Quality Court, Charlestown, Indiana 47111
Plant ID: 019-23027
FESOP Renewal No: 019-00041
Reviewer: ERG/SD
Date: April 10, 2007

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMSCF/year)

5.40

46.4

Emission Factor (lb/MMSCF)	* PM 1.9	* PM10 7.6	SO₂ 0.6	** NO_x 100	VOC 5.5	CO 84
Potential To Emit (tons/year)	0.04	0.18	0.01	2.32	0.13	1.95

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

** Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All emission factors are based on normal firing.

METHODOLOGY

Potential Throughput (MMSCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMSCF/1020 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMSCF/year) * Emission Factor (lb/MMSCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
Emissions from Natural Gas Combustion
(Space Heaters and Air-Makeup Units)**

Company Name: R.R. Donelley Charlestown, Inc.

Address: 100 Quality Court, Charlestown, Indiana 47111

Plant ID: 019-23027

FESOP Renewal No: 019-00041

Reviewer: ERG/SD

Date: November 8, 2006

HAPs - Organics

Emission Factor (lb/MMSCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	4.87E-05	2.78E-05	1.74E-03	4.17E-02	7.88E-05

HAPs - Metals

Emission Factor (lb/MMSCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	1.16E-05	2.55E-05	3.25E-05	8.81E-06	4.87E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1.4-2, 1.4-3 and 1.4-4 (July, 1998).

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
VOC Emissions From Nine (9) Printing Presses**

Company Name: R.R. Donelley Charlestown, Inc.
Address: 100 Quality Court, Charlestown, Indiana 47111
Plant ID: 019-23027
FESOP Renewal No: 019-00041
Reviewer: ERG/SD
Date: April 10, 2007

UNCONTROLLED PTE of VOC

Press ID	Maximum Line Speed (foot/minute)	Maximum Line Speed (MMin/year)	Maximum Print Width (inches)	Potential Press Throughput (MMin ² /year)	PTE of VOC per Press (tons/year)
C700A, C700B, and C700D	2,300	14,507	66	957,433	
Ink Name	Maximum Coverage (lb/MMin ²)	Weight % Volatiles	Flash Off %		
Ink	3.00	43%	80%		494
Fountain Solution	0.015	0%	100%		0
Cleaning Solution	0.005	100%	100%		2.39
Cleaning Solution	0.0005	100%	100%		0.24
Miscellaneous	0.00002	75%	100%		0.01
Press ID	Maximum Line Speed (foot/minute)	Maximum Line Speed (MMin/year)	Maximum Print Width (inches)		841,380
C700C	2,300	14,507	58		
Ink Name	Maximum Coverage (lb/MMin ²)	Weight % Volatiles	Flash Off %		
Ink	3.00	43%	80%	434	
Fountain Solution	0.015	0%	100%	0	
Cleaning Solution	0.005	100%	100%	2.10	
Cleaning Solution	0.0005	100%	100%	0.21	
Miscellaneous	0.00002	75%	100%	0.01	
Press ID	Maximum Line Speed (foot/minute)	Maximum Line Speed (MMin/year)	Maximum Print Width (inches)	372,125	
C500A and C500B	1,475	9,303	40		
Ink Name	Maximum Coverage (lb/MMin ²)	Weight % Volatiles	Flash Off %		
Ink	3.00	43%	80%		192
Fountain Solution	0.015	0%	100%		0
Cleaning Solution	0.005	100%	100%		0.93
Cleaning Solution	0.0005	100%	100%		0.09
Miscellaneous	0.00002	75%	100%		0.003
Press ID	Maximum Line Speed (foot/minute)	Maximum Line Speed (MMin/year)	Maximum Print Width (inches)	331,506	
C250A and C250B	1,460	9,209	36		
Ink Name	Maximum Coverage (lb/MMin ²)	Weight % Volatiles	Flash Off %		
Ink	3.00	43%	80%		171
Fountain Solution	0.015	0%	100%		0
Cleaning Solution	0.005	100%	100%		0.83
Cleaning Solution	0.0005	100%	100%		0.08
Miscellaneous	0.00002	75%	100%		0.002
Press ID	Maximum Line Speed (foot/minute)	Maximum Line Speed (MMin/year)	Maximum Print Width (inches)	179,377	
112	790	4983	36		
Ink Name	Maximum Coverage (lb/MMin ²)	Weight % Volatiles	Flash Off %		
Ink	3.00	8%	5%		1.08
Cleaning Solution	0.0005	100%	100%	0.04	

METHODOLOGY

Potential press throughput (MMin²/year) = Maximum line speed (foot/minute) * 12 inches/foot * 60 minutes/hour * 8760 hours/year * Maximum print width (inches) * 1/1000,000
 PTE of VOC (tons/year) = Maximum coverage (lb/MMin²) * Weight % Volatiles * Flash Off % * Potential press throughput (MMin²/year) * 1 ton/2000 lbs

**Appendix A: Emission Calculations
HAP Emissions From Eight (8) Printing Presses:**

Company Name: R.R. Donelley Charlestown, Inc.
Address: 100 Quality Court, Charlestown, Indiana 47111
Plant ID: 019-23027
FESOP Renewal No: 019-00041
Reviewer: ERG/SD
Date: April 10, 2007

Material Used in Printing Presses	Potential Press Throughput (MMin ² /year)	Maximum Coverage (lb/MMin ²)	HAP Weight %	Flash Off %	PTE of HAPs per Press (tons/year)
Press - C700A, C700B, C700D					
<i>Blanket Wash</i>					
Naphthalene	957,433	0.005	37%	100%	0.89
1,2,4 - Trimethylbenzene	957,433	0.005	7%	100%	0.17
Glycol Ether	957,433	0.005	35%	100%	0.84
<i>Technical Wash</i>					
Naphthalene	957,433	0.0005	29%	100%	0.07
1,2,4 - Trimethylbenzene	957,433	0.0005	6%	100%	0.01
Glycol Ether	957,433	0.0005	73%	100%	0.17
<i>Take it Off</i>					
1,2,4 - Trimethylbenzene	957,433	0.00002	6%	100%	5.74E-04
Glycol Ether	957,433	0.00002	73%	100%	0.01
Press - C700C					
<i>Blanket Wash</i>					
Naphthalene	841,380	0.005	37%	100%	0.78
1,2,4 - Trimethylbenzene	841,380	0.005	7%	100%	0.15
Glycol Ether	841,380	0.005	35%	100%	0.74
<i>Technical Wash</i>					
Naphthalene	841,380	0.005	29%	100%	0.61
1,2,4 - Trimethylbenzene	841,380	0.005	6%	100%	0.13
Glycol Ether	841,380	0.005	37%	100%	0.78
<i>Take it Off</i>					
1,2,4 - Trimethylbenzene	841,380	0.00002	1%	100%	6.73E-05
Glycol Ether	841,380	0.00002	37%	100%	3.11E-03
Press - C250A and C250B					
<i>Blanket Wash</i>					
Naphthalene	331,506	0.005	37%	100%	0.31
1,2,4 - Trimethylbenzene	331,506	0.005	7%	100%	0.06
Glycol Ether	331,506	0.005	35%	100%	0.29
<i>Technical Wash</i>					
Naphthalene	331,506	0.005	29%	100%	0.24
1,2,4 - Trimethylbenzene	331,506	0.005	6%	100%	0.05
Glycol Ether	331,506	0.005	73%	100%	0.60
<i>Take it Off</i>					
1,2,4 - Trimethylbenzene	331,506	0.00002	1%	100%	2.65E-05
Glycol Ether	331,506	0.00002	37%	100%	1.23E-03
Press - C500A					
<i>Blanket Wash</i>					
Naphthalene	372,125	0.005	37%	100%	0.34
1,2,4 - Trimethylbenzene	372,125	0.005	7%	100%	0.07
Glycol Ether	372,125	0.005	35%	100%	0.33
<i>Technical Wash</i>					
Naphthalene	372,125	0.0005	29%	100%	0.03
1,2,4 - Trimethylbenzene	372,125	0.0005	6%	100%	0.01
Glycol Ether	372,125	0.0005	73%	100%	0.07
<i>Take it Off</i>					
1,2,4 - Trimethylbenzene	372,125	0.00002	1%	100%	0.00
Glycol Ether	372,125	0.00002	37%	100%	0.00
Press - C500B					
<i>Blanket Wash</i>					
Naphthalene	372,125	0.005	37%	100%	0.34
1,2,4 - Trimethylbenzene	372,125	0.005	7%	100%	0.07
Glycol Ether	372,125	0.005	35%	100%	0.33
<i>Technical Wash</i>					
Naphthalene	372,125	0.0005	29%	100%	0.03
1,2,4 - Trimethylbenzene	372,125	0.0005	6%	100%	0.01

90.2

Press 112 does not use any material containing HAPs.

METHODOLOGY

Potential to Emit of HAP (tons/year) = Potential Throughput (MMin²/year) * Maximum Coverage (lb/MMin²) * HAP Weight % * Flash Off % * 1ton/2000 lbs