INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: November 13, 2006

RE: Courier Kendallville, Inc / 113-23204-00021

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

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised FESOP, with all revisions and amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Brian J. Pedersen, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, at 631-691-3395, ext. 19 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

BJP/MES
Attachments
cc: File - Noble County
U.S. EPA, Region V
Noble County Health Department
Northern Regional Office
Air Compliance Section Inspector – Doyle Houser
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner

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Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

Courier Kendallville, Inc.
2500 Marion Drive
Kendallville, Indiana 46755

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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.: F 113-12093-00021	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 13, 2000 Expiration Date: October 13, 2005

First Administrative Amendment No.113-16645-00021, issued on November 4, 2002
First Minor Permit Revision No. 113-16834-00021, issued on May 12, 2003
First Significant Permit Revision No. 113-17840-00021, issued on January 6, 2004
Second Significant Permit Revision No. 113-20307-00021, issued on May 27, 2005

Third Significant Permit Revision No.: 113-23204-00021	Conditions/Sections: Sections B, C, D.3 and Conditions A.2, A.3, D.1.1, D.1.2, D.1.4, D.1.5, D.1.6, D.1.7, D.1.8, D.1.9, D.1.10, D.2.4, D.2.5, D.2.11 and quarterly report forms
Issued by: Nisha Sizemore Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: **November 13, 2006**

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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 commercial printing source.

Authorized Individual:	Vice President Engineering
Source Address:	2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address:	2500 Marion Drive, Kendallville, Indiana 46755
General Source Phone Number:	978 - 251 - 6256
SIC Code:	2752
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

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) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 2.93 million British thermal units per hour, exhausting to one (1) stack, identified as 6;

(b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.4 million British thermal units per hour, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;

(c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 2.56 million British thermal units per hour, exhausting to one (1) stack, identified as 2;

(d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 million British thermal units per hour, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;

(e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches;

(f) One (1) sheetfed UV Coater with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches; and

(g) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 2, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 2 dryer, exhausting to one (1) of two (2) stacks Oxy 1 or Oxy 2, rated at: 10.5 million British thermal units per hour.

(h) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to one (1) of two (2) stacks Oxy 1 or Oxy 2, rated at: 10.5 million British thermal units per hour.

(i) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel at a maximum heat input rate of 0.81 million British thermal units per hour, exhausting through one (1) stack, identified as Oxy 2. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.

(j) One (1) regenerative thermal oxidizer, identified as Cleanswitch 2, using natural gas as a supplementary fuel at a maximum heat input rate of 0.81 million British thermal units per hour, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.

(k) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 3, exhausting through stack TNV 1, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 3 dryer, exhausting through stack TNV 1, rated at: 10.5 million British thermal units per hour.

(l) One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 1, at a maximum heat input rate of 5.31 million British thermal units per hour, exhausting through one (1) stack, identified as TNV 1. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 20 parts per million of hexane, minus methane, and is used to control VOC emissions from the Lithoman 3 printing press.

A.3 Specifically Regulated 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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of 0.20 million British thermal units per hour;

(2) Three (3) natural gas-fired air make-up units, two (2) with a maximum heat input rate of 0.18 million British thermal units per hour, each, and one (1) with a maximum heat

input capacity of 0.15 million British thermal units per hour;

(3) One (1) natural gas fired space heater, with a maximum heat input capacity of 0.25 million British thermal units per hour;

(4) Nineteen (19) natural gas fired HVAC units, seventeen (17) with a maximum heat input rating of 0.400 million British thermal units per hour, each, one (1) with a maximum heat input rating of 0.350 million British thermal units per hour, and one (1) with a maximum heat input capacity of 0.125 million British thermal units per hour;

(5) One (1) natural gas fired space heater with a rating of 0.075 million British thermal units per hour.

(b) The following VOC storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual through-puts less than 12,000 gallons;

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(c) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;

(e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(g) Paved and unpaved roads and parking lots with public access;

(h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(i) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:

(1) The cleaning solvent used on the UV coater;

(2) One (1) film cleaner used in the plating room;

(j) Other activities or categories not previously identified:

(1) Five (5) binding operations, identified as Corona Binder, Fox Stitcher, Norm Binder, Kolbus Binder, and Kolbus K-2, each with a maximum capacity of 560 pounds of paper waste per hour;

(2) Film processor used to develop black and white film; and

(3) Five (5) plate processors used to develop printing plates;

(4) Two (2) casemakers, identified as Kolbus DA-36;

(5) Two (2) tippers, identified as Hunkeler VEA; and

(6) Eight (8) electric plate processing ovens.

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

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

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, 113-12093-00021, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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, 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 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.9 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

(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 submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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, and Northern Regional Officewithin 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
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(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 2-8and 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 113-12093-00021 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) monthsprior 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
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
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) monthsprior 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 revisionsare governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by 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
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 in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(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] [IC13-30-3-1]

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 FESOPsource 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
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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.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] [326 IAC 2-2] [326 IAC 2-3]

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 satisfy the requirements of 326 IAC 2-3 (Emission Offset);

(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 and fifty (250) tons per twelve (12) consecutive month period. This limitation shall make 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 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity

monitor) in a six (6) hour period.

C.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
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 orized 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
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 within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

Unless otherwise specified in the approval for the new emission unit(s), 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;

(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 and twenty (120) days is not practicable, IDEM, OAQ, may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require the certification by 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
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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

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

Stratospheric Ozone Protection

C.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 FACILITY OPERATION CONDITIONS

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

(a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 2.93 million British thermal units per hour, exhausting to one (1) stack, identified as 6;

(b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.0 million British thermal units per hour, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;

(g) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 2, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 2 dryer, exhausting to one (1) of two (2) stacks Oxy 1 or Oxy 2, rated at 10.5 million British thermal units per hour.

(h) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to one (1) of two (2) stacks Oxy 1 or Oxy 2, rated at 10.5 million British thermal units per hour.

(i) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel at a maximum heat input rate of 0.81 million British thermal units per hour, exhausting through one (1) stack, identified as Oxy 2. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.

(j) One (1) regenerative thermal oxidizer, identified as Cleanswitch 2, using natural gas as a supplementary fuel at a maximum heat input rate of 0.81 million British thermal units per hour, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.

(k) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 3, exhausting through stack TNV 1, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 3 dryer, exhausting through stack TNV 1, rated at 10.5 million British thermal units per hour.

(l) One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 1, at a maximum heat input rate of 5.31 million British thermal units per hour, exhausting through one (1) stack, identified as TNV 1. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 20 parts per million of hexane, minus methane, and is used to control VOC emissions from the Lithoman 3 printing press.

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

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

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

(a) VOC emissions from the printing presses, identified as Mark 16, the printing press, identified as M850, the printing press, identified as Lithoman, the printing press, identified as Lithoman 2, the printing press, identified as Lithoman 3, the printing press, identified as Mark 6 (listed in Section D.2), the printing press, identified as M130 (listed in Section D.2), and the printing press, identified as Heidelberg Sheetfed Press (listed in Section D.2), shall be limited to less than a total of 97.5 tons per tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The VOC emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will operated at any one (1) time. Compliance with this limit will be demonstrated by using the following equation:

Presses with thermal oxidizer
En = Un x Vn x F x {1 - (Cn/100) x (Dn/100)}

Presses without thermal oxidizer
En = Un x Vn x F

Total VOC Emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:

Et	=	VOC emissions from all presses
En	=	VOC emissions from each press
Un	=	Total usage of each material from each press
Vn	=	VOC content of each material from each press
F	=	Flash off factor of each material from each press
Cn	=	Capture efficiency for each thermal oxidizer from each press
Dn	=	Destruction efficiency for each oxidizer from each press(Oxidizer control efficiency)

(b) The single HAP and combination of HAPs emissions from the heat set web offset lithographic printing presses, identified as Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman, Lithoman 2, and the Heidelberg Sheetfed Press shall be limited to a total of less than 8.7 tons and 23.7 tons, respectively, per twelve (12) consecutive month period with compliance determined at the end of each month. The HAP emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will operated at any one (1) time. Compliance with these limits shall be demonstrated by using the following equation:

Presses with thermal oxidizer
En = Un x Hn x F x {1 - (Cn/100) x (Dn/100)}

Presses without thermal oxidizer
En = Un x Hn x F

Total HAP Emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:

Et = HAP emissions from all presses
En = HAP emissions from all presses
Un = Total usage of each material from all presses
Hn = Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs from all presses
F = Flash off factor of each material from all presses
Cn = Capture efficiency for each thermal oxidizer from each press
Dn = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the one (1) printing press, identified as Lithoman has been determined to be:

The use of one (1) of the regenerative thermal oxidizers, identified Cleanswitch 2 or Cleanswitch, at all times the press is in operation.

(b) Pursuant to 326 IAC 8-1-6, the Best Available Control technology (BACT) for the one (1) heat set web offset lithographic printing press, identified as Lithoman 2, shall be as follows:

(1) The exhaust shall be vented to one of the two (2) regenerative thermal oxidizers (Cleanswitch or Cleanswitch 2) with a minimum of 97% destruction efficiency for VOC;

(2) The VOC content of the fountain solution shall be no greater than 3% VOC as applied;

(3) The blanket and roller washes shall have a vapor pressure no greater than 10 mm Hg at 20ºC or the VOC content shall be limited to 2.5 lb/gal as applied; and

(4) The capture efficiencies used for reporting compliance shall be as follows and are based on the US EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94):

(A) 100 percent capture, by weight, of the VOC in press ready inks;

(B) 70 percent capture, by weight, of the VOC in press ready fountain solutions; and

(C) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.

(c) Pursuant to 326 IAC 8-1-6, the Best Available Control technology (BACT) for the one (1) heat set web offset lithographic printing press, identified as Lithoman 3, has determined to be as follows:

(1) The exhaust shall be vented to the one (1) integrated recuperative thermal oxidizer , identified as TNV 1, with a minimum of 98% destruction efficiency for VOC as demonstrated by achieving a VOC outlet concentration of 20ppmv or less as hexane, minus methane and ethane;

(2) The VOC content of the fountain solution shall be no greater than 3% VOC as applied;

(3) The blanket and roller washes shall have a vapor pressure no greater than 10 mm Hg at 20ºC or the VOC content shall be limited to 2.5 lbs/gal as applied; and

(4) The capture efficiencies used for reporting compliance shall be as follows and are based on the US EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 93)::

(A) 100 percent capture, by weight, of the VOC in press ready inks;

(B) 70 percent capture, by weight, of the VOC in press ready fountain solutions; and

(C) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.

(d) VOC input from the one (1) printing press, identified as Mark 16 shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than twenty five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.

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 printing press M850 and its control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

(a) Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration.

(b) Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).

(c) Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) integrated recuperative thermal oxidizer, identified as TNV 1, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with Conditions D.1.1 and D.1.2(a), (b), and (c).

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the ink, coating, fountain solution and cleaning solvent manufacturers. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

(a) At least one (1) regenerative thermal oxidizer, identified as Cleanswitch 2 or Cleanswitch, shall be in operation at all times when the printing press (M850) is in operation.

(b) The integrated recuperative thermal oxidizer, identified as TNV 1, shall be in operation at all times when the printing press Lithoman 3 is in operation.

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

D.1.8 Volatile Organic Compound Control

(a) When operating the printing press M850 and the printing press M130 (listed in Section D.2), and the printing press Lithoman, the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, and the one (1) regenerative thermal oxidizer, identified as Cleanswitch, shall maintain a minimum operating temperature of 1,600ºF or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-1-6 satisfied.

(b) When operating the printing press Lithoman 2, the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, or the one (1) regenerative thermal oxidizer, identified as Cleanswitch, shall maintain a minimum operating temperature of 1,600ºF or a temperature determined in the most recent compliance stack tests to maintain at least 97.0% destruction efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded when the Lithoman 3 printing press in operation.

(c) When operating the printing press Lithoman 3, the one (1) integrated recuperative thermal oxidizer, identified as TNV 1, shall maintain a minimum operating temperature of 1,400ºF or a temperature determined in the most recent compliance stack tests to maintain at least 98.0% destruction efficiency as demonstrated by achieving a VOC outlet concentration of 20ppmv or less as hexane, minus methane and ethane. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever the Lithoman 3 printing press is in operation. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever the Lithoman 3 printing press is in operation.

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

D.1.9 Record Keeping Requirements

(a) The Permittee shall maintain records of the materials used that contain any VOCs and/or HAPs. The records shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAPs emission limits established in Condition D.1.1. The records shall contain, as a minimum, the following information:

(1) The weight of VOC and HAP-containing material used and the weight percent VOC and HAP, including purchase orders and invoices necessary to verify the type and amount used; or

(2) The volume of VOC-containing material used and the weight of VOC per volume of VOC-containing material used.

(3) The weight of VOCs and HAPs emitted for each compliance period, considering capture and destruction (or removal) efficiency.

(4) Operational parameters of the VOC and HAP emission control equipment, considering capture and destruction (or removal) efficiency.

(5) Operational parameters of the VOC and HAP emission control equipment, such as:

(A) Data used to establish the capture and destruction (or removal) efficiencies at the time of the initial compliance test; and

(B) Temperature readings.

(b) To document compliance with Condition D.1.2(d), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2(d).

(1) The amount and VOC content of each ink, fountain solution, coating material and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to inks and fountain solutions and those used as cleanup solvents;

(2) A monthly log of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

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

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2(d) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the Aauthorized individual@ as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY CONDITIONS

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

(c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 2.56 million British thermal units per hour, exhausting to one (1) stack, identified as 2;

(d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, each with a maximum heat input rate of 4.0 million British thermal units per hour, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;

(e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches;

(f) One (1) sheetfed UV Coater with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches; and

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

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

D.2.4 FESOP Limit [326 IAC 2-8-4]

(a) VOC emissions from the printing presses, identified as Mark 16 (listed in Section D.1), the printing press, identified as M850 (listed in Section D.1), the printing press, identified as

Lithoman (listed in Section D.1), the printing press, identified as Lithoman 2 (listed in Section D.1), the printing press, identified as Lithoman 3 (listed in Section D.1), the printing press, identified as Mark 6, the printing press, identified as M130, and the printing press, identified as Heidelberg Sheetfed Press, shall be limited to less than a total of 97.5 tons per twelve consecutive month period, with compliance determined at the end of each month. The VOC emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will be operated at any one (1) time. Compliance with this limit will be demonstrated by using the following equation:

Presses with thermal oxidizer
En = Un x Vn x F x {1 - (Cn/100) x (Dn/100)}

Presses without thermal oxidizer
En = Un x Vn x F

Total VOC emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:

Et = Total VOC emissions from all presses
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
Cn = Capture efficiency for each thermal oxidizer from each press
Dn = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

(b) The single HAP and combination of HAPs emissions from the heat set web offset lithographic printing presses, identified as Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman, Lithoman 2, and the Heidelberg Sheetfed Press shall be limited to a total of less than 8.7 tons and 23.7 tons, respectively, per twelve (12) consecutive month period with compliance determined at the end of each month. The HAP emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will be operated at any one (1) time. Compliance with this limit shall be demonstrated by using the following equation:

Presses with thermal oxidizer
En = Un x Hn x F x {1 - (Cn/100) x (Dn/100)}

Presses without thermal oxidizer
En = Un x Hn x F

Total HAP emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:

Et = HAP emissions from all presses
En = HAP emissions
Un = Total usage of each material
Hn = Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs

F = Flash off factor of each material
Cn = Capture efficiency
Dn = Destruction efficiency (Oxidizer control efficiency)

D.2.5 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

(a) One of the regenerative thermal oxidizers, either Cleanswitch 2 or Cleanswitch, shall be in operation at all times the printing presses identified as M130 and M850 are in operation, to meet the requirements of 326 IAC 8-1-6.

(b) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for each of the printing presses, identified as Lithoman and Lithoman 2 has been determined to be:

The use of one (1) of the regenerative thermal oxidizers, identified as Cleanswitch 2 or Cleanswitch, at all times the press is in operation.

D.2.6 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 printing press M130 and its control devices.

Compliance Determination Requirements

D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

(a) Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration.

(b) Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).

D.2.8 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Condition D.2.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the ink, fountain solution, coating and cleaning solvent manufacturers. However, IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.9 VOC Emissions

One (1) regenerative thermal oxidizer, identified as Cleanswitch 2 or Cleanswitch, shall be in operation at all times when the printing press (M130) is in operation.

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

D.2.10 Volatile Organic Compound Control

(a) When operating the printing press M130, printing press M850 (listed in Section D.1), and the printing press Lithoman (listed in Section D.1) the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, and the one (1) regenerative thermal oxidizer, identified as Cleanswitch, shall maintain a minimum operating temperature of 1,600ºF or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall

control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-1-6 satisfied.

(b) When operating the printing press Lithoman 2, the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, or the one (1) regenerative thermal oxidizer, identified as Cleanswitch, shall maintain a minimum operating temperature of 1,600ºF or a temperature determined in the most recent compliance stack tests to maintain at least 97.0% destruction efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation.

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

D.2.11 Record Keeping Requirements

(a) The Permittee shall maintain records of the materials used that contain any VOCs and/or HAPs. The records shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAPs emission limits established in Condition D.2.4. The records shall contain, as a minimum, the following information:

(1) The weight of VOC and HAP-containing material used and the weight percent VOC and HAP, including purchase orders and invoices necessary to verify the type and amount used; or

(2) The volume of VOC-containing material used and the weight of VOC per volume of VOC-containing material used.

(3) The weight of VOCs and HAPs emitted for each compliance period, considering capture and destruction (or removal) efficiency.

(4) Operational parameters of the VOC and HAP emission control equipment, considering capture and destruction (or removal) efficiency.

(5) Operational parameters of the VOC and HAP emission control equipment, such as:

(A) Data used to establish the capture and destruction (or removal) efficiencies at the time of the initial compliance test; and

(B) Temperature readings.

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

D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the Aauthorized individual@ as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

All conditions in this section have been deleted.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP No.: F 113-12093-00021

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
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP No.: F 113-12093-00021

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- 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: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP MPR No.: 113-16834-00021
Facility: One (1) heat set web offset lithographic printing press, identified as Mark 16
Parameter: VOC usage
Limit: VOC usage not to exceed 25 tons per year

YEAR:_____

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

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
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

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP No.: F 113-12093-00021
Facilities: Eight (8) printing presses (Mark 16, M850, Lithoman, Lithoman 2, Lithoman 3, Mark 6, M130, and Heidelberg Sheetfed Press)
Parameter: VOC Emissions
Limit: 97.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:

Presses with thermal oxidizer
$En = Un \times Vn \times F \times \{1 - (Cn/100) \times (Dn/100)\}$
Presses without thermal oxidizer
$En = Un \times Vn \times F$
Total VOC Emissions from all presses
$Et = E(\text{Lithoman}) + E(\text{Lithoman 2}) + E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{M130}) + E(\text{Heidelberg})$

Where:
Et = VOC emissions from all presses
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
Cn = Capture efficiency for each control device from each press
Dn = Destruction efficiency for each control device from each press (Oxidizer control efficiency)

YEAR:_____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
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

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP SPR No.: SPR 113-23204-00021
Facilities: Eight (8) printing presses (Mark 16, M850, Lithoman, Lithoman 2, Lithoman 3, Mark 6, M130, and Heidelberg Sheetfed Press)
Parameter: Single Worst Case HAP emissions
Limit: Less than 8.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:

Presses with thermal oxidizer
$En = Un \times Hn \times F \times \{1 - (Cn/100) \times (Dn/100)\}$
Presses without thermal oxidizer
$En = Un \times Vn \times F$
Total HAP emissions from all presses
$Et = E(Lithoman) + E(Lithoman\ 2) + E(Lithoman\ 3) + E(Mark\ 6) + E(M130) + E(Heidelberg)$

Where:
Et = HAP emissions from all presses
En = HAP emissions from each press
Un = Total usage of each material from each press
Hn = Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs from each press
F = Flash off factor of each material from each press
Cn = Capture efficiency for each oxidizer from each press
Dn = Destruction efficiency for each oxidizer from each press (Oxidizer control efficiency)

YEAR:_____

Month	Single HAP Emissions (tons)	Single HAP Emissions (tons)	Single HAP Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
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

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP SPR No.: SPR 113-23204-00021
Facilities: Eight (8) printing presses (Mark 16, M850, Lithoman, Lithoman 2, Lithoman 3, Mark 6, M130, and Heidelberg Sheetfed Press)
Parameter: Total HAP Emissions
Limit: Less than 23.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:

Presses with thermal oxidizer
$En = Un \times Hn \times F \times \{1 - (Cn/100) \times (Dn/100)\}$
Presses without thermal oxidizer
$En = En = Un \times Vn \times F$
Total HAP emissions from all presses
$Et = E(Lithoman) + E(Lithoman\ 2) + E(Lithoman\ 3) + E(Mark\ 6) + E(M130) + E(Heidelberg)$

Where:
Et = HAP emissions from all presses
En = HAP emissions from each press
Un = Total usage of each material from each press
Hn = Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs from each press
F = Flash off factor of each material from each press
Cn = Capture efficiency for each oxidizer from each press
Dn = Destruction efficiency for each oxidizer from each press (Oxidizer control efficiency)

YEAR:_____

Month	HAP Emissions (tons)	HAP Emissions (tons)	HAP Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
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: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP No.: F 113-12093-00021

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ANo deviations occurred this reporting period@.

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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: _____

A certification is not required for this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for a
Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Name:	**Courier Kendallville, Inc.**
Source Location:	**2500 Marion Drive, Kendallville, Indiana 46755**
County:	**Noble**
SIC Code:	**2752**
Operation Permit No.:	**F 113-12093-00021**
Significant Permit Revision No.:	**SPR 113-23204-00021**
Permit Reviewer:	**Brian J. Pedersen**

On September 25, 2006, the Office of Air Quality (OAQ) had a notice published in the News-Sun, Kendallville, Indiana, stating that Courier Kendallville, Inc. had applied for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) to operate a commercial printing source with thermal oxidizers used for control of VOC emissions. The notice also stated that OAQ proposed to issue a Significant Permit Revision to a FESOP for this operation and provided information on how the public could review the proposed Significant Permit Revision to a FESOP 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 Significant Permit Revision to a FESOP should be issued as proposed.

On September 27, 2006, Mark O'Donoghue of Courier Kendallville, Inc. submitted comments on the proposed Significant Permit Revision to the FESOP. The comments are as follows (the permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded):**

Comment 1:

Courier Kendallville, Inc. wishes to incorporate the addition of a new binder to the insignificant activities. Also, the emission data associated with the new Corona Binder and the other insignificant binding operations is provided, as requested by IDEM, OAQ.

Response 1:

As a result of this comment, IDEM, OAQ has made the following changes to Conditions A.3, D.1.1(a), D.2.4(a), a Quarterly Report form, and the Potential to Emit of the Source table. Revised spreadsheets are attached as Appendix C to this TSD Addendum and Courier Kendallville, Inc. has been informed and understands that the VOC limit of 98.1 tons per year has been adjusted to 97.5 tons per year to take into account the VOC emissions from the binding operations.

A.3 Specifically Regulated 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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of 0.20 million British thermal units per hour;

(2) Three (3) natural gas-fired air make-up units, two (2) with a maximum heat input rate of 0.18 million British thermal units per hour, each, and one (1) with a maximum heat input capacity of 0.15 million British thermal units per hour;

(3) One (1) natural gas fired space heater, with a maximum heat input capacity of 0.25 million British thermal units per hour;

(4) Nineteen (19) natural gas fired HVAC units, seventeen (17) with a maximum heat input rating of 0.400 million British thermal units per hour, each, one (1) with a maximum heat input rating of 0.350 million British thermal units per hour, and one (1) with a maximum heat input capacity of 0.125 million British thermal units per hour;

(5) One (1) natural gas fired space heater with a rating of 0.075 million British thermal units per hour.

(b) The following VOC storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual through-puts less than 12,000 gallons;

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(c) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;

(e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(g) Paved and unpaved roads and parking lots with public access;

(h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(i) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:

(1) The cleaning solvent used on the UV coater;

(2) One (1) film cleaner used in the plating room;

(j) Other activities or categories not previously identified:

(1) **Five (5)** ~~Four (4)~~ binding operations, identified as **Corona Binder,** Fox Stitcher, Norm Binder, Kolbus Binder, and Kolbus K-2, each with a maximum capacity of 560 pounds of paper waste per hour;

(2) Film processor used to develop black and white film; and

(3) Five (5) plate processors used to develop printing plates;

(4) Two (2) casemakers, identified as Kolbus DA-36;

(5) Two (2) tippers, identified as Hunkeler VEA; and

(6) Eight (8) electric plate processing ovens.

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

(a) VOC emissions from the printing presses, identified as Mark 16, the printing press, identified as M850, the printing press, identified as Lithoman, the printing press, identified as Lithoman 2, the printing press, identified as Lithoman 3, the printing press, identified as Mark 6 (listed in Section D.2), the printing press, identified as M130 (listed in Section D.2), and the printing press, identified as Heidelberg Sheetfed Press (listed in Section D.2), shall be limited to less than a total of **97.5** ~~98.1~~ tons per tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The VOC emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will operated at any one (1) time. Compliance with this limit will be demonstrated by using the following equation:

Presses with thermal oxidizer
En = Un x Vn x F x {1 - (Cn/100) x (Dn/100)}

Presses without thermal oxidizer
En = Un x Vn x F

Total VOC Emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:

Et	=	VOC emissions from all presses
En	=	VOC emissions from each press
Un	=	Total usage of each material from each press
Vn	=	VOC content of each material from each press
F	=	Flash off factor of each material from each press
Cn	=	Capture efficiency for each thermal oxidizer from each press
Dn	=	Destruction efficiency for each oxidizer from each press(Oxidizer control efficiency)

(b) The single HAP and combination of HAPs emissions from the heat set web offset lithographic printing presses, identified as Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman, Lithoman 2, and the Heidelberg Sheetfed Press shall be limited to a total of less than **8.7** ~~9.3~~ tons and **23.7** ~~24.3~~ tons, respectively, per twelve (12) consecutive month period with compliance determined at the end of each month. The HAP emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will operated at any one (1) time. Compliance with these limits shall be demonstrated by using the following equation:

Presses with thermal oxidizer
En = Un x Hn x F x {1 - (Cn/100) x (Dn/100)}

Presses without thermal oxidizer
En = Un x Hn x F

Total HAP Emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:

Et = HAP emissions from all presses
En = HAP emissions from all presses
Un = Total usage of each material from all presses
Hn = Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs from all presses
F = Flash off factor of each material from all presses
Cn = Capture efficiency for each thermal oxidizer from each press
Dn = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

D.2.4 FESOP Limit [326 IAC 2-8-4]

(a) VOC emissions from the printing presses, identified as Mark 16 (listed in Section D.1), the printing press, identified as M850 (listed in Section D.1), the printing press, identified as Lithoman (listed in Section D.1), the printing press, identified as Lithoman 2 (listed in Section D.1), the printing press, identified as Lithoman 3 (listed in Section D.1), the printing press, identified as Mark 6, the printing press, identified as M130, and the printing press, identified as Heidelberg Sheetfed Press, shall be limited to less than a total of **97.5** ~~98.1~~ tons per twelve consecutive month period, with compliance determined at the end of each month. The VOC emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will be operated at any one (1) time. Compliance with this limit will be demonstrated by using the following equation:

Presses with thermal oxidizer
En = Un x Vn x F x {1 - (Cn/100) x (Dn/100)}

Presses without thermal oxidizer
En = Un x Vn x F

Total VOC emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:

Et = Total VOC emissions from all presses
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
Cn = Capture efficiency for each thermal oxidizer from each press
Dn = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

(b) The single HAP and combination of HAPs emissions from the heat set web offset lithographic printing presses, identified as Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman, Lithoman 2, and the Heidelberg Sheetfed Press shall be limited to a total of less than **8.7** ~~9.3~~ tons and **23.7** ~~24.3~~ tons, respectively, per twelve (12) consecutive month period with compliance

determined at the end of each month. The HAP emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will be operated at any one (1) time. Compliance with this limit shall be demonstrated by using the following equation:

Presses with thermal oxidizer
En = Un x Hn x F x {1 - (Cn/100) x (Dn/100)}

Presses without thermal oxidizer
En = Un x Hn x F

Total HAP emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:

Et = HAP emissions from all presses
En = HAP emissions
Un = Total usage of each material
Hn = Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs
F = Flash off factor of each material
Cn = Capture efficiency
Dn = Destruction efficiency (Oxidizer control efficiency)

Potential to Emit of Source After Issuance

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

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Existing Source	-	-	-	Limited to less than **97.5**~~98.1~~	-	-	Single less than **8.7** ~~9.3~~ Total less than **23.7** ~~24.3~~
Proposed Revision	-	-	-		-	-	
Insignificant Activities (entire source)	0.628	2.51	0.198	**2.38** ~~1.82~~	27.8	33.1	**1.18** ~~0.624~~
Title V threshold	-	100	100	100	100	100	10/25

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

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP No.: F 113-12093-00021
Facilities: Eight (8) printing presses (Mark 16, M850, Lithoman, Lithoman 2, Lithoman 3, Mark 6, M130, and Heidelberg Sheetfed Press)
Parameter: VOC Emissions
Limit: **97.5** ~~98.1~~ tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:

Presses with thermal oxidizer
$En = Un \times Vn \times F \times \{1 - (Cn/100) \times (Dn/100)\}$
Presses without thermal oxidizer
$En = Un \times Vn \times F$
Total VOC Emissions from all presses
$Et = E(Lithoman) + E(Lithoman\ 2) + E(Lithoman\ 3) + E(Mark\ 6) + E(M130) + E(Heidelberg)$

Where:
Et = VOC emissions from all presses
En = VOC emissions from each press
Un = Total usage of each material from each press
Vn = VOC content of each material from each press
F = Flash off factor of each material from each press
Cn = Capture efficiency for each control device from each press
Dn = Destruction efficiency for each control device from each press (Oxidizer control efficiency)

YEAR:_____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
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

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP SPR No.: SPR 113-23204-00021
Facilities: Eight (8) printing presses (Mark 16, M850, Lithoman, Lithoman 2, Lithoman 3, Mark 6, M130, and Heidelberg Sheetfed Press)
Parameter: Single Worst Case HAP emissions
Limit: Less than **8.7** ~~9.3~~ tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:

Presses with thermal oxidizer
$En = Un \times Hn \times F \times \{1 - (Cn/100) \times (Dn/100)\}$
Presses without thermal oxidizer
$En = Un \times Vn \times F$
Total HAP emissions from all presses
$Et = E(Lithoman) + E(Lithoman\ 2) + E(Lithoman\ 3) + E(Mark\ 6) + E(M130) + E(Heidelberg)$

Where:
Et = HAP emissions from all presses
En = HAP emissions from each press
Un = Total usage of each material from each press
Hn = Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs from each press
F = Flash off factor of each material from each press
Cn = Capture efficiency for each oxidizer from each press
Dn = Destruction efficiency for each oxidizer from each press (Oxidizer control efficiency)

YEAR:_____

Month	Single HAP Emissions (tons)	Single HAP Emissions (tons)	Single HAP Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
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

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP SPR No.: SPR 113-23204-00021
Facilities: Eight (8) printing presses (Mark 16, M850, Lithoman, Lithoman 2, Lithoman 3, Mark 6, M130, and Heidelberg Sheetfed Press)
Parameter: Total HAP Emissions
Limit: Less than **23.7** ~~24.3~~ tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:

Presses with thermal oxidizer
En = Un x Hn x F x {1 - (Cn/100) x (Dn/100)}
Presses without thermal oxidizer
En = En = Un x Vn x F
Total HAP emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:
Et = HAP emissions from all presses
En = HAP emissions from each press
Un = Total usage of each material from each press
Hn = Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs from each press
F = Flash off factor of each material from each press
Cn = Capture efficiency for each oxidizer from each press
Dn = Destruction efficiency for each oxidizer from each press (Oxidizer control efficiency)

YEAR:_____

Month	HAP Emissions (tons)	HAP Emissions (tons)	HAP Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
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

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	**Courier Kendallville, Inc.**
Source Location:	**2500 Marion Drive, Kendallville, Indiana 46755**
County:	**Noble**
SIC Code:	**2752**
Operation Permit No.:	**F 113-12093-00021**
Operation Permit Issuance Date:	**October 13, 2000**
Significant Permit Revision No.:	**SPR 113-23204-00021**
Permit Reviewer:	**Brian J. Pedersen**

The Office of Air Quality (OAQ) has reviewed a Significant Permit Revision application from Courier Kendallville, Inc. relating to the construction and operation of the following emission units and pollution control devices:

(a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 3, exhausting through stack TNV 1, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 3 dryer, exhausting through stack TNV 1, rated at: 10.5 million British thermal units per hour.

(b) One (1) natural gas-fired integrated recuperative thermal oxidizer, identified as TNV 1, at a maximum heat input rate of 5.31 million British thermal units per hour, exhausting through one (1) stack, identified as TNV 1. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 20 parts per million of hexane, minus methane, and is used to control VOC emissions from the Lithoman 3 printing press.

(c) One (1) casemaker, identified as Kolbus DA-36.

(d) One (1) tipper, identified as Hunkeler VEA.

(e) Three (3) electric plate processing ovens.

(f) One (1) natural gas-fired air make up unit, with a maximum heat input capacity of 0.180 million British thermal units per hour.

(g) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.250 million British thermal units per hour.

(h) Two (3) natural gas-fired HVAC units, two (2) with a maximum heat input capacity of 0.400 million British thermal units per hour, each and one (1) with a maximum heat input capacity of 0.125 million British thermal units per hour.

The capacities of the six (6) natural gas-fired space heaters have also been amended as follows:

(i) Six (6) natural gas-fired space heaters, each with a maximum capacity of **0.20** ~~0.15~~ million British thermal units per hour.

History

Courier Kendallville, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) on October 13, 2000. On June 9, 2006, Courier Kendallville, Inc. submitted an application to the OAQ requesting to add an additional heat set web offset lithographic printing press (Lithoman 3), equipped with a natural gas-fired dryer, to their existing plant. The new press will be controlled by an integrated recuperative thermal oxidizer, identified as TNV 1. The oxidizer will control VOC emissions from the proposed Lithoman 3 printing press. This revision also addresses the removal of the one (1) natural gas-fired boiler rated at 3.0 million British thermal units per hour, the addition of insignificant combustion units and the maximum heat input capacity has been amended for the six (6) natural gas-fired space heaters, from 0.15 million British thermal units per hour, each, to 0.20 million British thermal units per hour, each.

Also, submitted with this application SPR 113-23204-00021 were potential to emit of HAP emissions related to all presses at Courier Kendallville, Inc. The Lithoman and Lithoman 2 presses previously listed no HAPs pertaining to these operations. This omission has been addressed and corrected in this application. Due to the current potential to emit of single and combination HAPs, exceeding ten (10) and twenty five (25) tons per year, respectively, for the entire source, HAP limits shall be established for the entire source to ensure the source shall not be subject to the Part 70 rules.

Enforcement Issue

Although the source has constructed and operated numerous insignificant operations, the combined total emissions are within the exempt category pursuant to 326 IAC 2-1.1-3. Therefore, there are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
TNV 1	Lithoman 3 Dryer/Oxidizer	27	2.33	9903	650

Recommendation

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

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

An application for the purposes of this review was received on June 16, 2006. Additional information was received on July 11, 2006.

Emission Calculations

See pages 1 through 7 of Appendix A of this document for detailed emissions calculations

Potential To Emit of Revision

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

processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.

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

Pollutant	Potential To Emit (tons/year)
PM	0.145
PM_{10}	0.581
SO_2	0.046
VOC	637
CO	6.43
NO_X	7.65

HAPs	Potential To Emit (tons/year)
Single HAP	8.98
Total HAPs	12.0

Justification for Revision

The FESOP is being revised through a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(f)(1) since the potential to emit VOC from this revision is greater than twenty five (25) tons per year.

County Attainment Status

The source is located in Noble County.

Pollutant	Status
$PM_{2.5}$	Attainment
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
8-Hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to ozone. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Noble County has been classified as unclassifiable or attainment for $PM_{2.5}$. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for $PM_{2.5}$ emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for $PM_{2.5}$ emissions, it has directed states to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions.

(c) Noble County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 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 or Emission Offset Definition (emissions after controls, based upon 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	**Emissions** (tons/year)
PM	0.602
PM_{10}	2.41
SO_2	0.190
VOC	Limited to less than 100
CO	26.6
NO_X	31.7
HAPs	Single less than 10
	Combination less than 25

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories.

(b) These emissions are based upon the TSD for SPR 113-20307-00021 and SPR application 113-23204-00021.

Potential to Emit of Source After Issuance

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

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Existing Source	-	-	-	Limited to less than 98.1	-	-	Single less than 9.3 Total less than 24.3
Proposed Revision	-	-	-		-	-	
Insignificant Activities (entire source)	0.628	2.51	0.198	1.82	27.8	33.1	0.624
Title V threshold	-	100	100	100	100	100	10/25

(a) The VOC emissions from the proposed new printing press are to be limited under an existing VOC limit that covers the seven (7) existing presses, therefore, the only increase in VOC emissions due to this revision are from the natural gas combustion associated with the Lithoman 3 dryer, the TNV 1 oxidizer, and the insignificant combustion units. The VOC limit has been decreased from 98.5 to 98.1 tons per year to account for the increase in natural gas combustion emissions. The HAP emissions from the proposed new printing press shall be incorporated into a source wide HAP limit. This limit shall limit the amount of single HAP to less than 9.3 tons per year and the combination of HAPs to less than 24.3 tons per year, for the entire source.

(b) This revision to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(c) This revision to the existing FESOP will not change the status of the stationary source because the emissions from the entire source will still be limited to less than the Part 70 major source thresholds.

Federal Rule Applicability

(a) The provisions of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart QQ), are not included in this permit because this printing press is not a publication rotogravure printing press.

(b) There are no other New Source Performance Standards included in the permit for this source.

(c) The provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, Subpart KK (Printing and Publishing Industry) are not included in this permit because the printing press is not a publication rotogravure, packaging rotogravure or wide-web flexographic printing press.

(d) The potential to emit of a single Hazardous Air Pollutant (HAP) is limited to less than ten (10) tons per year and the potential to emit of combined Hazardous Air Pollutants (HAPs) is limited to less than twenty-five (25) tons per year from the entire source pursuant to Condition C.2, formerly C.1, Overall Source Limit. Therefore, this source is a minor source of Hazard-

ous Air Pollutants (HAPs) and the provisions of 40 CFR 63, Subpart JJJJ (Paper and Other Web Coating), shall not be included in this permit.

(e) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit for this source.

State Rule Applicability – Entire Source

326 IAC 2-8-4 (FESOP)

The single HAP and combination HAP emissions from the heat set web offset lithographic printing presses, identified as Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman, Lithoman 2, and the Heidelberg Sheetfed Press shall be limited to a total of less than 9.3 tons and 24.3 tons per year, respectively, per twelve (12) consecutive month period with compliance determined at the end of each month. These limits were established to take into account the potential to emit of HAPs for all combustion units. The HAP emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will be operated at any one (1) time.

Compliance with this limit will be demonstrated by using the following equation:

Presses with thermal oxidizers
$En = Un \times Hn \times F \times \{1 - (Cn/100) \times (Dn/100)\}$

Presses without thermal oxidizers
$En = Un \times Hn \times F$

Total HAP emissions from all presses
$Et = E(\text{Lithoman}) + E(\text{Lithoman 2}) + E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{M130}) + E(\text{Heidelberg})$

Where:

Et	=	HAP emissions from all presses
En	=	HAP emissions from each press
Un	=	Total usage of each material from each press
Hn	=	Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs from each press
F	=	Flash off factor of each material from each press
Cn	=	Capture efficiency for each thermal oxidizer from each press
Dn	=	Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

State Rule Applicability - Individual Facilities

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

The unrestricted potential to emit VOC from this revision is greater than two-hundred fifty (250) tons per year. The potential to emit VOC from the entire source is limited to less than one-hundred (100) tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-2.

326 IAC 2-8-4 (FESOP)

The VOC emissions from the proposed heat set web offset lithographic printing press, identified as Lithoman 3, shall be included in the existing VOC limit which already limits the VOC emissions from the Mark 6, the Mark 16, the M130, the M850, the Lithoman, Lithoman 2, and the Heidelberg Sheetfed Press.

This limit had been a VOC emission limit of less than 98.5 tons per year, which was designed to ensure that VOC emissions from the entire source are less than one hundred (100) tons per year,

including VOC emissions from natural gas combustion. This limit is changed to be less than 98.1 tons of VOC per year total, to account for the increased VOC emissions from the additional natural gas combustion that is associated with this revision. The VOC emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will operated at any one (1) time.

Compliance with this limit will be demonstrated by using the following equation:

Presses with thermal oxidizer
En = Un x Hn x F x {1 (Cn/100) x (Dn/100)}

Presses without thermal oxidizer
En = Un x Hn x F

Total VOC emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:

Et	=	Total VOC emissions from all presses
En	=	VOC emissions from each press
Un	=	Total usage of each material from each press
Vn	=	VOC content of each material from each press
F	=	Flash off factor of each material from each press
Cn	=	Capture efficiency for each thermal oxidizer from each press
Dn	=	Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

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

The one (1) heat set web offset lithographic printing press, identified as Lithoman 3, is subject to the requirements of 326 IAC 8-1-6 because the VOC emissions from this press are greater than twenty-five (25) tons per year.

After conducting the top-down BACT analysis (see Appendix B of this document), the Best Available Control technology (BACT) for the one (1) heat set web offset lithographic printing press, identified as Lithoman 3, shall be as follows:

(a) The exhaust shall be vented to the one (1) integrated recuperative thermal oxidizer (TNV 1) with a minimum of 98% destruction efficiency for VOC;

(b) The VOC content of the fountain solution shall be no greater than 3% VOC as applied;

(c) The blanket and roller washes shall have a vapor pressure no greater than 10 mm Hg at 20ºC or the VOC content shall be limited to 2.5 lb/gal as applied; and

(d) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94):

(1) 100 percent capture, by weight, of the VOC in press ready inks;

(2) 70 percent capture, by weight, of the VOC in press ready fountain solutions; and

(3) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.

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

The one (1) heat set web offset lithographic printing press, identified as Lithoman 3, is not subject to the requirements of 326 IAC 8-5-5, because the printing press does not involve packaging rotogravure, publication rotogravure or flexographic printing.

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.

There are no new compliance monitoring requirements applicable to this revision.

Testing Requirements

Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the proposed new integrated recuperative thermal oxidizer, identified as TNV 1, utilizing methods as approved by the Commissioner.

Proposed Changes

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

Change 1:

1. All references to IDEM, OAQ's mailing address have been revised as follows:

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

2. IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Condition B.11 – Preventive Maintenance and has amended Condition B.12 – Emergency Provisions.

3. For clarification purposes, Condition B.19 - Operational Flexibility has been revised.

4. In accordance with the requirements of 326 IAC 1-1-6, a condition for Credible Evidence has been added to Section B of the permit.

5. In order to avoid duplication of requirements which may be included in D sections, original Condition C.6 – Operation of Equipment has been removed from the permit.

6. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan (Condition C.15). The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. Therefore, the condition for "Compliance Monitoring Plan – Failure to Take Response Steps" has been replaced by the condition for "Response to Excursions or Exceedances". The Section D conditions that refer to this condition have been revised to reflect the new condition title (see the changes in the section of Proposed Changes).

7. Condition A.5 (Prior Permits Conditions) has been moved to Condition B.13.

~~A.5 Prior Permit Conditions~~

~~(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.~~

~~(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.~~

~~SECTION B GENERAL CONDITIONS~~

~~B.1 Permit No Defense [IC 13]~~

~~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.~~

~~B.2 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.3 Permit Term [326 IAC 2-8-4(2)]~~

~~This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.~~

~~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, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.~~

B.5 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.6 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.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

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

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

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, then the Permittee must furnish record directly to the U.S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 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.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) 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.~~

~~B.11 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 a 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, on the attached Certification Form, with each submittal.~~

~~(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).~~

~~B.12 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. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:~~

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

~~(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, 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]~~

~~(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each facility:~~

~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.14 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 describes 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

~~Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]~~

~~(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:~~

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

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

~~The notice fulfills the requirement of 326 IAC 2-8-4(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 the "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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.~~

~~(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(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 compliance 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.

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 Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

within ten (10) calendar days from the date of the discovery of the deviation, except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

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 FESOP 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 the "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 the "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
Indianapolis, Indiana 46204

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

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

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

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

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 a reasonable deadline specified in writing by IDEM, OAQ, any additional information identified as 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
Indianapolis, Indiana 46204~~

~~Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.~~

~~(c) The Permittee may implement the 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]~~

~~(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);~~

~~(4) The Permittee notifies the:~~

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

~~and~~

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

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

~~(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to 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), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and after submittal of the following additional information:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter at reasonable times 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements;

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]; and

(f) Nothing in this permit shall be constructed to limit the Permittee's right, to the extent allowed by law, to obtain duplicate or split samples.

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
Indianapolis, Indiana 46204

The application which shall be submitted by the Permittee does not require the certification by the "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 2-8-11(b)(3)]

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

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. 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 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if failure to commence construction of the emission unit within eighteen (18) months from the date of issuance of the permit, or if during the construction of work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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 from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(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) 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.

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five

(35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "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 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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
Indianapolis, Indiana 46204

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "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 the "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 within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within 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. 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)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

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

Compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

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

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such

time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour (this time frame is determined on a case by case basis) until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

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

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.

(1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.

(2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.16 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 corrective actions. The Permittee shall submit a description of these corrective 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 corrective actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data and support information shall be retained for a period

of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. 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) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(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
Indianapolis, Indiana 46204

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

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this

~~permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

~~(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.~~

~~**Stratospheric Ozone Protection**~~

~~C.19 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 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, 113-12093-00021, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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, 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 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.9 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

(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 submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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, and Northern Regional Office 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
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877**

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(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 2-8and 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 113-12093-00021 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) monthsprior 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
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 Permitmodification, 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
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
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
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 in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(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] [IC13-30-3-1]

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 FESOPsource 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
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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.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 satisfy the requirements of 326 IAC 2-3 (Emission Offset);

(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 and fifty (250) tons per twelve (12) consecutive month period. This limitation shall make 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 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.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
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
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 within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

Unless otherwise specified in the approval for the new emission unit(s), 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;

(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 and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require the certification by 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
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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

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

Stratospheric Ozone Protection

C.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.

Change 2:

The addition of the one (1) heat set web offset lithographic printing press, identified as Lithoman 3, the one (1) natural gas-fired integrated recuperative thermal oxidizer, identified as TNV 1, numerous insignificant activities, and corrections to descriptive information has been reflected in Conditions A.2, A.3, and the Facility Descriptions in Sections D.1 and D.2. Condition A.3 has been amended and Section D.3 has been deleted because the one (1) natural gas-fired boiler, with a maximum heat input rate of 3.0 million British thermal units per hour is no longer in operation and has been removed as follows:

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) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 2.93 million British thermal units per hour, exhausting to one (1) stack, identified as 6;

(b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer

and Harris M850 Lower Dryer, each with a maximum heat input rate of 4.4 million British thermal units per hour, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;

(c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 2.56 million British thermal units per hour, exhausting to one (1) stack, identified as 2;

(d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris **M130** ~~M850~~ Upper Dryer and Harris **M130** ~~M850~~ Lower Dryer, each with a maximum heat input rate of 4.0 million British thermal units per hour, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;

(e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches;

(f) One (1) sheetfed UV Coater with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches; and

(g) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 2, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 2 dryer, exhausting to one (1) of two (2) stacks Oxy 1 or Oxy 2, rated at: 10.5 million British thermal units per hour.

(h) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to one (1) of two (2) stacks Oxy 1 or Oxy 2, rated at: 10.5 million British thermal units per hour.

(i) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel at a maximum heat input rate of 0.81 million British thermal units per hour, exhausting through one (1) stack, identified as Oxy 2. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.

(j) One (1) regenerative thermal oxidizer, identified as Cleanswitch 2, using natural gas as a supplementary fuel at a maximum heat input rate of 0.81 million British thermal units per hour, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.

(k) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 3, exhausting through stack TNV 1, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 3 dryer, exhausting through stack TNV 1, rated at: 10.5 million British thermal units per hour.

(l) One (1) natural gas-fired integrated recuperative thermal oxidizer, identified as TNV 1, at a maximum heat input rate of 5.31 million British thermal units per hour, exhausting through one (1) stack, identified as TNV 1. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 20 parts per million of hexane, minus methane, and is used to control VOC emissions from the Lithoman 3 printing press.

A.3 Specifically Regulated 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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of **0.20** ~~0.15~~ million British thermal units per hour;

(2) **Three (3)** ~~Two (2)~~ natural gas-fired air make-up units, **two (2)** with a maximum heat input rate of 0.18 million British thermal units per hour**, each,** and **one (1) with a maximum heat input capacity of** 0.15 million British thermal units per hour~~, respectively~~;

(3) **One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 million British thermal units per hour** ~~One (1) natural gas-fired boiler, with a maximum heat input rate of 3.0 million British thermal units per hour~~;

(4) **Nineteen (19)** ~~Sixteen (16)~~ natural gas-fired HVAC units, **seventeen (17)** ~~fifteen (15)~~ with a **maximum heat input** rating of 0.400 million British thermal units per hour, each, one (1) with a **maximum heat input** rating of 0.350 million British thermal units per hour, **and one (1) with a maximum heat input capacity of 0.125 million British thermal units per hour**;

(5) One (1) natural gas-fired space heater with a rating of 0.075 million British thermal units per hour.

(b) The following VOC storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual through-puts less than 12,000 gallons;

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(c) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;

(e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(g) Paved and unpaved roads and parking lots with public access;

(h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(i) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:

(1) The cleaning solvent used on the UV coater;

(2) One (1) film cleaner used in the plating room;

(j) Other activities or categories not previously identified:

(1) Four (4) binding operations, identified as Fox Stitcher, Norm Binder, Kolbus Binder, and Kolbus K-2, each with a maximum capacity of 560 pounds of paper waste per hour;

(2) Film processor used to develop black and white film; and

(3) Five (5) plate processors used to develop printing plates;

(4) **Two (2)** ~~One (1)~~ casemaker**s**, identified as Kolbus DA-36;

(5) One (1) tipper, identified as Hunkeler VEA; and

(6) **Eight (8)** ~~Five (5)~~ electric plate processing ovens.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, with a maximum line speed of 1265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, each with a maximum heat input rate of 2.93 million British thermal units per hour, exhausting to one (1) stack, identified as 6;

(b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, with a maximum line speed of 1600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris ~~M130~~ M850 Upper Dryer and Harris ~~M130~~ M850 Lower Dryer, each with a maximum heat input rate of 4.0 million British thermal units per hour, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;

(g) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 2, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 2 dryer, exhausting to one (1) of two (2) stacks Oxy 1 or Oxy 2, rated at: 10.5 million British thermal units per hour.

(h) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, exhausting through stacks Oxy 1 or Oxy 2, with a maximum line speed of 2211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to one (1) of two (2) stacks Oxy 1 or Oxy 2, rated at: 10.5 million British thermal units per hour.

(i) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel at a maximum heat input rate of 0.81 million British thermal units per hour, exhausting through one (1) stack, identified as Oxy 2. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.

(j) One (1) regenerative thermal oxidizer, identified as Cleanswitch 2, using natural gas as a supplementary fuel at a maximum heat input rate of 0.81 million British thermal units per hour, exhausting through one (1) stack, identified as Oxy 1. The oxidizer has a minimum temperature of 1,600 F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.

(k) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 3, exhausting through stack TNV 1, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 3 dryer, exhausting through stack TNV 1, rated at: 10.5 million British thermal units per hour.

(l) One (1) natural gas-fired integrated recuperative thermal oxidizer, identified as TNV 1, at a maximum heat input rate of 5.31 million British thermal units per hour, exhausting through one (1) stack, identified as TNV 1. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 20 parts per million of hexane, minus methane, and is used to control VOC emissions from the Lithoman 3 printing press.

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

SECTION D.2 FACILITY CONDITIONS

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

(c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, each with a maximum heat input rate of 2.56 million British thermal units per hour, exhausting to one (1) stack, identified as 2;

(d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, with a maximum line speed of 1264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris **M130** ~~M850~~ Upper Dryer and Harris **M130** ~~M850~~ Lower Dryer, each with a maximum heat

input rate of 4.0 million British thermal units per hour, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2;

(e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches;

(f) One (1) sheetfed UV Coater with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches; and

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

SECTION D.3 FACILITY OPERATION CONDITIONS

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

~~(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:~~

~~(1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of 0.15 million British thermal units per hour;~~

~~(2) Two (2) natural gas-fired air make-up units, with a maximum heat input rate of 0.18 million British thermal units per hour and 0.15 million British thermal units per hour, respectively; and~~

~~(3) One (1) natural gas-fired boiler, with a maximum heat input rate of 3.0 million British thermal units per hour.~~

All conditions in this section have been deleted.

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

~~**Boilers**~~

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

~~D.3.1 Particulate Matter (PM)~~

~~Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units which have 10 million British thermal units per hour heat input or less and which began operation after September 21, 1983, shall in no case exceed 0.6 lb/Million British thermal units heat input. Therefore PM emissions from the 3 million British thermal units per hour boiler shall be limited to 0.6 lb/Million British thermal units heat input.~~

Change 3:

The addition of the new printing press and the integrated recuperative thermal oxidizer, identified as Lithoman 3 and TNV, respectively, shall be included in Conditions D.1.1, D.1.4, D.1.5, D.1.7, D.1.8, and D.1.9. The FESOP limits and BACT limits have been separated. Also a source wide HAP usage limit shall be incorporated into Conditions D.1.1 and D.1.9 and quarterly report forms have been added as follows:

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

D.1.1 FESOP Limit [326 IAC 2-8-4]~~[326 IAC 8-1-6]~~

(a) VOC emissions from the printing press**es**, identified as Mark 16, the printing press, identified as M850, the printing press, identified as Lithoman, the printing press, identified as Lithoman 2, **the printing press, identified as Lithoman 3,** the printing press, identified as Mark 6 (listed in Section D.2), the printing press, identified as M130 (listed in Section D.2), and the printing press, identified as Heidelberg Sheetfed Press (listed in Section D.2), shall be limited to less than **a total of** 98.**1**~~5~~ tons ~~per tons~~ per twelve (12) consecutive month period, with compliance determined at the end of each month. **The VOC emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will operated at any one (1) time.** Compliance with this limit will be demonstrated by using the following equation:

Presses with thermal oxidizer
En = Un x Vn x F x {1 - (Cn/100) x (Dn/100)}

Presses without thermal oxidizer
En = Un x Vn x F

Total VOC emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:

Et	**=**	**Total VOC emissions from all presses**
En	=	VOC emissions **from each press**
Un	=	Total usage of each material **from each press**
Vn	=	VOC content of each material **from each press**
F	=	Flash off factor of each material **from each press**
Cn	=	Capture efficiency **for each thermal oxidizer from each press**
Dn	=	Destruction efficiency **for each thermal oxidizer from each press** (Oxidizer control efficiency)

~~One of the regenerative thermal oxidizers, either Cleanswitch 2 or Cleanswitch, shall be in operation at all times the printing presses identified as M130 and M850 are in operation, to meet the requirements of 326 IAC 8-1-6.~~

(b) The single HAP and combination of HAPs emissions from the heat set web offset lithographic printing presses, identified as Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman, Lithoman 2, and the Heidelberg Sheetfed Press shall be limited to a total of less than 9.3 tons and 24.3 tons, respectively, per twelve (12) consecutive month period with compliance determined at the end of each month. The HAP emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will operated at any one (1) time. Compliance with these limits shall be demonstrated by using the following equation:

Presses with thermal oxidizer
En = Un x Hn x F x {1 - (Cn/100) x (Dn/100)}

Presses without thermal oxidizer
En = Un x Hn x F

Total HAP emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:

Et = Total HAP emissions from all presses
En = HAP emissions from each press
Un = Total usage of each material from each press
Hn = Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs from each press
F = Flash off factor of each material from each press
Cn = Capture efficiency for each thermal oxidizer from each press
Dn = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

(a) ~~(b)~~ Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the one (1) printing press, identified as Lithoman has been determined to be:

The use of one (1) of the regenerative thermal oxidizers, identified Cleanswitch 2 or Cleanswitch, at all times the press is in operation.

(b)~~(c)~~ Pursuant to 326 IAC 8-1-6, the Best Available Control technology (BACT) for the one (1) heat set web offset lithographic printing press, identified as Lithoman 2, shall be as follows:

(1) The exhaust shall be vented to one of the two (2) regenerative thermal oxidizers (Cleanswitch or Cleanswitch 2) with a minimum of 97% destruction efficiency for VOC;

(2) The VOC content of the fountain solution shall be no greater than 3% VOC as applied;

(3) The blanket and roller washes shall have a vapor pressure no greater than 10 mm Hg at 20ºC or the VOC content shall be limited to 2.5 lb/gal as applied; and

(4) The capture efficiencies used for reporting compliance shall be as follows and are based on the US EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94):

(A) 100 percent capture, by weight, of the VOC in press ready inks;

(B) 70 percent capture, by weight, of the VOC in press ready fountain solutions; and

(C) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.

(c) Pursuant to 326 IAC 8-1-6, the Best Available Control technology (BACT) for the one (1) heat set web offset lithographic printing press, identified as Lithoman 3, has determined to be as follows:

(1) The exhaust shall be vented to the one (1) integrated recuperative thermal oxidizer , identified as TNV 1, with a minimum of 98% destruction efficiency for VOC as demonstrated by achieving a VOC outlet concentration of 20ppmv or less as hexane, minus methane and ethane;

(2) The VOC content of the fountain solution shall be no greater than 3% VOC as applied;

(3) The blanket and roller washes shall have a vapor pressure no greater than 10 mm Hg at 20ºC or the VOC content shall be limited to 2.5 lbs/gal as applied; and

(4) The capture efficiencies used for reporting compliance shall be as follows and are based on the US EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 93):

(A) 100 percent capture, by weight, of the VOC in press ready inks;

(B) 70 percent capture, by weight, of the VOC in press ready fountain solutions; and

(C) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.

(d) VOC input from the one (1) printing press, identified as Mark 16 shall be limited to less than **twenty five (**25**)** tons per **twelve (**12**)** consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than **twenty five (**25**)** tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

(a) Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration.

(b) Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).

(c) Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) integrated recuperative thermal oxidizer, identified as TNV 1, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with Conditions D.1.1~~(b) and (c) (BACT)~~ **and D.1.2(a), (b), and (c)**.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition**s** D.1.1 and **D.1.2** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the ink, coating, fountain solution and cleaning solvent manufacturers. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

(a) At least one (1) regenerative thermal oxidizer, identified as Cleanswitch 2 or Cleanswitch, shall be in operation at all times when the printing press (M850) is in operation.

(b) The integrated recuperative thermal oxidizer, identified as TNV 1, shall be in operation at all times when the printing press Lithoman 3 is in operation.

D.1.8 Volatile Organic Compound Control

(a) When operating the printing press M850 and the printing press M130 (listed in Section D.2), and the printing press Lithoman, the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, and the one (1) regenerative thermal oxidizer, identified as Cleanswitch, shall maintain a minimum operating temperature of 1,600ºF or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-1-6 satisfied.

(b) When operating the printing press Lithoman 2, the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, or the one (1) regenerative thermal oxidizer, identified as Cleanswitch, shall maintain a minimum operating temperature of 1,600ºF or a temperature determined in the most recent compliance stack tests to maintain at least 97.0% destruction efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation.

(c) When operating the printing press Lithoman 3, the one (1) integrated recuperative thermal oxidizer, identified as TNV 1, shall maintain a minimum operating temperature of 1,400ºF or a temperature determined in the most recent compliance stack tests to maintain at least 98.0% destruction efficiency as demonstrated by achieving a VOC outlet concentration of 20ppmv or less as hexane, minus methane and ethane. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever the Lithoman 3 printing press is in operation.

D.1.9 Record Keeping Requirements

(a) The Permittee shall maintain records of the materials used that contain any VOCs **and/or HAPs**. The records shall be complete and sufficient to establish compliance with the VOC **and HAP** usage limits and/or the VOC **and HAPs** emission limits established in Condition

D.1.1. The records shall contain, as a minimum, the following information:

(1) The weight of VOC **and HAP**-containing material used and the weight percent VOC **and HAP**, including purchase orders and invoices necessary to verify the type and amount used; or

(2) The volume of VOC-containing material used and the weight of VOC per volume of VOC-containing material used.

(3) The weight of VOCs **and HAPs** emitted for each compliance period, considering capture and destruction (or removal) efficiency.

(4) Operational parameters of the VOC **and HAP** emission control equipment, considering capture and destruction (or removal) efficiency.

(5) Operational parameters of the VOC **and HAP** emission control equipment, such as:

(A) Data used to establish the capture and destruction (or removal) efficiencies at the time of the initial compliance test; and

(B) Temperature readings.

(b) To document compliance with Condition D.1.2**(d)**, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2**(d)**.

(1) The amount and VOC content of each ink, fountain solution, coating material and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to inks and fountain solutions and those used as cleanup solvents;

(2) A monthly log of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

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

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2**(d)** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the Aauthorized individual@ as defined by 326 IAC 2-1.1-1(1).

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

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP SPR No.: SPR 113-23204-00021
Facilities: Eight (8) printing presses (Mark 16, M850, Lithoman, Lithoman 2, Lithoman 3, Mark 6, M130, and Heidelberg Sheetfed Press)
Parameter: Single Worst Case HAP emissions
Limit: Less than 9.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:

Presses with thermal oxidizer
$En = Un \times Hn \times F \times \{1 - (Cn/100) \times (Dn/100)\}$
Presses without thermal oxidizer
$En = En = Un \times Vn \times F$
Total HAP emissions from all presses
$Et = E(Lithoman) + E(Lithoman\ 2) + E(Lithoman\ 3) + E(Mark\ 6) + E(M130) + E(Heidelberg)$

Where:

Et	=	HAP emissions from all presses
En	=	HAP emissions from each press
Un	=	Total usage of each material from each press
Hn	=	Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs from each press
F	=	Flash off factor of each material from each press
Cn	=	Capture efficiency for each oxidizer from each press
Dn	=	Destruction efficiency for each oxidizer from each press (Oxidizer control efficiency)

YEAR:_____

Month	Single HAP Emissions (tons)	Single HAP Emissions (tons)	Single HAP Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
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

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP SPR No.: SPR 113-23204-00021
Facilities: Eight (8) printing presses (Mark 16, M850, Lithoman, Lithoman 2, Lithoman 3, Mark 6, M130, and Heidelberg Sheetfed Press)
Parameter: Total Combination of HAPs Emissions
Limit: Less than 24.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:

Presses with thermal oxidizer
$En = Un \times Hn \times F \times \{1 - (Cn/100) \times (Dn/100)\}$
Presses without thermal oxidizer
$En = En = Un \times Vn \times F$
Total HAP emissions from all presses
$Et = E(Lithoman) + E(Lithoman\ 2) + E(Lithoman\ 3) + E(Mark\ 6) + E(M130) + E(Heidelberg)$

Where:

Et	=	HAP emissions from all presses
En	=	HAP emissions from each press
Un	=	Total usage of each material from each press
Hn	=	Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs from each press
F	=	Flash off factor of each material from each press
Cn	=	Capture efficiency for each oxidizer from each press
Dn	=	Destruction efficiency for each oxidizer from each press (Oxidizer control efficiency)

YEAR:_____

Month	HAP Emissions (tons)	HAP Emissions (tons)	HAP Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Change 4:

The addition of the new printing press and the integrated recuperative thermal oxidizer, identified as Lithoman 3 and TNV 1, respectively, shall be referenced in Condition D.2.4, which now reflects only the FESOP limits. Condition D.2.5 shall now reflect the BACT limits only, a quarterly report form and the HAP limits has been added to Conditions D.2.4 FESOP Limit and D.2.11 Record Keeping, as well as the deletion of record keeping requirements for the Mark 6 or the Heidelberg Sheetfed Press as follows:

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

D.2.4 FESOP Limit [326 IAC 2-8-4]~~[326 IAC 8-1-6]~~

(a) VOC emissions from the printing press**es**, identified as Mark 16 (listed in Section D.1), the printing press, identified as M850 (listed in Section D.1), the printing press, identified as Lithoman (listed in Section D.1), the printing press, identified as Lithoman 2 (listed in Section D.1), **the printing press, identified as Lithoman 3 (listed in Section D.1),** the printing press, identified as Mark 6, the printing press, identified as M130, and the printing press, identified as Heidelberg Sheetfed Press, shall be limited to less than **a total of** 98.1~~5~~ tons per twelve consecutive month period, with compliance determined at the end of each month. **The VOC emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will be operated at any one (1) time.** Compliance with this limit will be demonstrated by using the following equation:

Presses with thermal oxidizer
En = Un x Vn x F x {1 - (Cn/100) x (Dn/100)}

Presses without thermal oxidizer
En = Un x Vn x F

Total VOC emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:

Et	**=**	**Total VOC emissions from all presses**
En	=	VOC emissions **from each press**
Un	=	Total usage of each material **from each press**
Vn	=	VOC content of each material **from each press**
F	=	Flash off factor of each material **from each press**
Cn	=	Capture efficiency **for each thermal oxidizer from each press**
Dn	=	Destruction efficiency **for each thermal oxidizer from each press** (Oxidizer control efficiency)

~~One of the regenerative thermal oxidizers, either Cleanswitch 2 or Cleanswitch, shall be in operation at all times the printing presses identified as M130 and M850 are in operation, to meet the requirements of 326 IAC 8-1-6.~~

~~(b) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for each of the printing presses, identified as Lithoman and Lithoman 2 has been determined to be:~~

~~The use of one (1) of the regenerative thermal oxidizers, identified as Cleanswitch 2 or Cleanswitch, at all times the press is in operation.~~

(b) The single HAP and combination of HAPs emissions from the heat set web offset lithographic printing presses, identified as Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman, Lithoman 2, and the Heidelberg Sheetfed Press shall be limited to a total of less than 9.3 tons and 24.3 tons, respectively, per twelve (12) consecutive month period with compliance determined at the end of each month. The HAP emissions calculated shall be the sum of each individual printing press. Either thermal oxidizer Cleanswitch or Cleanswitch 2 will be operated at any one (1) time. Compliance with this limit shall be demonstrated by using the following equation:

Presses with thermal oxidizer
En = Un x Hn x F x {1 - (Cn/100) x (Dn/100)}

Presses without thermal oxidizer
En = Un x Hn x F

Total HAP emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:

Et = Total HAP emissions from all presses
En = HAP emissions
Un = Total usage of each material
Hn = Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs
F = Flash off factor of each material
Cn = Capture efficiency
Dn = Destruction efficiency (Oxidizer control efficiency)

D.2.5 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

(a) One of the regenerative thermal oxidizers, either Cleanswitch 2 or Cleanswitch, shall be in operation at all times the printing presses identified as M130 and M850 are in operation, to meet the requirements of 326 IAC 8-1-6.

(b) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for each of the printing presses, identified as Lithoman and Lithoman 2 has been determined to be:

The use of one (1) of the regenerative thermal oxidizers, identified as Cleanswitch 2 or Cleanswitch, at all times the press is in operation.

~~Any change or modification which would increase the potential to emit VOC from press Mark 6 or the Heidelberg Sheetfed Press to twenty five (25) tons per year or more, respectively, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.~~

D.2.11 Record Keeping Requirements

(a) The Permittee shall maintain records of the materials used that contain any VOCs **and/or HAPs**. The records shall be complete and sufficient to establish compliance with the VOC **and HAP** usage limits and/or the VOC **and HAPs** emission limits established in ~~c~~**C**ondition D.2.4. The records shall contain, as a minimum, the following information:

(1) The weight of VOC **and HAP**-containing material used and the weight percent VOC and HAP, including purchase orders and invoices necessary to verify the type and amount used; or

(2) The volume of VOC-containing material used and the weight of VOC per volume of VOC-containing material used.

(3) The weight of VOCs **and HAPs** emitted for each compliance period, considering capture and destruction (or removal) efficiency.

(4) Operational parameters of the VOC **and HAP** emission control equipment, considering capture and destruction (or removal) efficiency.

(5) Operational parameters of the VOC **and HAP** emission control equipment, such as:

(A) Data used to establish the capture and destruction (or removal) efficiencies at the time of the initial compliance test; and

(B) Temperature readings.

~~(b) To document compliance with Condition D.2.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.5.~~

~~(1) The amount and VOC content of each ink, fountain solution, coating material and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(2) A monthly log of use;~~

~~(3) The cleanup solvent usage for each month;~~

~~(4) The total VOC usage for each month; and~~

~~(5) The weight of VOCs emitted for each compliance period.~~

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

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

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755
FESOP No.: F 113-12093-00021
Facilities: **Eight (8)** ~~Seven (7)~~ printing presses (Mark 16, M850, Lithoman**,** Lithoman 2, **Lithoman 3,** Mark 6, M130, **and** Heidelberg Sheetfed Press)
Parameter: VOC Emissions
Limit: 98.**1**~~5~~ tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:

Presses with thermal oxidizer
En = Un x Vn x F x {1 - (Cn/100) x (Dn/100)}
Presses without thermal oxidizer
En = Un x Vn x F
Total VOC Emissions from all presses
Et = E(Lithoman) + E(Lithoman 2) + E(Lithoman 3) + E(Mark 6) + E(M130) + E(Heidelberg)

Where:
Et = VOC emissions from all presses
En = VOC emissions **from each press**
Un = Total usage of each material **from each press**
Vn = VOC content of each material **from each press**
F = Flash off factor of each material **from each press**
Cn = Capture efficiency **for each control device from each press**
Dn = Destruction efficiency **for each control device from each press** (Oxidizer control efficiency)

YEAR: _____

Month	VOC emissions (tons)	VOC emissions (tons)	VOC emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ 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.

Conclusion

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 113-23204-00021.

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: **Courier Kendallville, Inc.**
Address City IN Zip: **2500 Marion Drive, Kendallville, Indiana 46755**
Permit Number: **SPR 113-23204-00021**
Plt ID: **113-00021**
Reviewer: **Brian J. Pedersen**
Application Date: **July 9, 2006**

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Lithoman 3	2211	57	794877

INK VOCS

Ink Name	Maxium Coverage (lbs/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/Year)	Emissions (TONS/YEAR)
Ink-Process Black	4	34.56%	80.00%	794877	439.54
Ink-Process Blue	4	39.62%	80.00%	794877	503.89
Ink-Process Red	4	40.54%	80.00%	794877	515.59
Ink-Process Yellow	4	43.85%	80.00%	794877	557.69
Fountain Solution (Emerald AMVP)	0.15	87.40%	100.00%	794877	52.10
Cleaning Solvent (A-60 Odorless)	0.14	96.80%	50.00%	794877	26.93
Cleaning Solvent (LPC)	0.14	92.40%	50.00%	794877	25.71
Misc	0.001	75.00%	100.00%	794877	0.30

Total VOC Emissions =	**637.02 Ton/yr**

METHODOLOGY

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: **Courier Kendallville, Inc.**
Address City IN Zip: **2500 Marion Drive, Kendallville, Indiana 46755**
Permit Number: **SPR 113-23204-00021**
Plt ID: **113-00021**
Reviewer: **Brian J. Pedersen**
Application Date: **July 9, 2006**

Unit	MMBtu/hr
Lithoman 3 dryer	10.50
TNV 1	5.31
New insig.(includes corrected capacity for existing space heaters)	1.66
Total	**17.5**

Heat Input Capacity	Potential Throughput
MMBtu/hr	MMCF/yr
17.5	153

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.145	0.581	0.046	7.65	0.421	6.43

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: **Courier Kendallville, Inc.**
Address City IN Zip: **2500 Marion Drive, Kendallville, Indiana 46755**
Permit Number: **SPR 113-23204-00021**
Plt ID: **113-00021**
Reviewer: **Brian J. Pedersen**
Application Date: **July 9, 2006**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.000161	0.000092	0.005737	0.137694	0.000260

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021	**Total**
Potential Emission in tons/yr	0.00004	0.00008	0.00011	0.00003	0.00016	**0.144**

Methodology is the same as page 2.

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Natural Gas Combustion from Entire Source

Company Name: **Courier Kendallville, Inc.**
Address City IN Zip: **2500 Marion Drive, Kendallville, Indiana 46755**
Permit Number: **SPR 113-23204-00021**
Plt ID: **113-00021**
Reviewer: **Brian J. Pedersen**
Application Date: **July 9, 2006**

Unit	MMBtu/hr
Mark 16	5.86
M850	8.80
Mark 6	5.12
M130	8.00
Lithoman dryer	10.50
Cleanswitch	0.810
Lithoman 2 dryer	10.50
Cleanswitch 2	0.810
Lithoman 3 dryer	10.50
TNV 1	5.31
Insignificant	9.31
Total	**75.5**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
75.52	662

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.628	2.514	0.198	33.078	1.819	27.785

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Natural Gas Combustion from Entire Source
HAPs Emissions

Company Name: **Courier Kendallville, Inc.**
Address City IN Zip: **2500 Marion Drive, Kendallville, Indiana 46755**
Permit Number: **SPR 113-23204-00021**
Plt ID: **113-00021**
Reviewer: **Brian J. Pedersen**
Application Date: **July 9, 2006**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.000695	0.000397	0.024808	0.595400	0.001125

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021	**Total**
Potential Emission in tons/yr	0.00017	0.00036	0.00046	0.00013	0.00069	**0.624**

Methodology is the same as page 4.

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

Appendix A: Emissions Calculations
HAPs From Printing Press (Lithoman 3)

Company Name: **Courier Kendallville, Inc.**
Address City IN Zip: **2500 Marion Drive, Kendallville, Indiana 46755**
Permit Number: **SPR 113-23204-00021**
Plt ID: **113-00021**
Reviewer: **Brian J. Pedersen**
Application Date: **July 9, 2006**

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Lithoman 3	2211	57	794877

INK VOCS

Ink Name	Maxium Coverage (lbs/MMin^2)	Weight % HAP	Flash Off %	Throughput (MMin^2/Year)	Potential to Emit of HAPs Before Controls (TONS/YEAR)
Fountain Solution (Emerald AMVP)					
Glycol Ethers	0.15	15.00%	100.00%	794877	8.94
Cleaning Solvent					
Xylene	0.14	5.00%	50.00%	794877	1.39
Cumene	0.14	5.00%	50.00%	794877	1.39
Ethyl Benzene	0.14	1.00%	50.00%	794877	0.28
Misc					
Hexane	0.001	1.88%	100.00%	794877	0.007
Glycol Ether	0.001	10.00%	100.00%	794877	0.040

Before Controls

Combination HAPs =	**12.0 Ton/yr**
Worst case single HAP=	**8.98 Ton/yr**

METHODOLOGY

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

HAP Emissions (tons/yr) = Maximum Coverage pounds per MMin^2 * Weight percentage HAP * Flash off * Throughput * Tons per 2000 pounds

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
HAP Emissions from Existing Source for Printing Presses

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
Permit Number: SPR 113-23204-00021
Plt ID: 113-00021
Reviewer: Brian J. Pedersen
Application Date: July 9, 2006

Material	Maximum Print Width (inches)	Maxium Line Speed (feet/min)	Maximum Coverage (lbs/MMin^2)	Flash Off %	Weight % Xylene	Weight % Diethanolamine	Weight % Napthalene	Weight % Cumene	Weight % Glycol Ethers	Weight % Ethyl Benzene	Weight % Hexane	Xylene Emissions (ton/yr)	Diethanolamine Emmisions (ton/yr)	Napthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Total HAPs per coating (ton/yr)
Printing Press Mark 6																			
LPC	35.5	950	0.14	50.0%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.74	0.00	0.00	0.74
Printing Press Mark 16																			
LPC	35.5	1265	0.14	50.0%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.99	0.00	0.00	0.99
Printing Press M130																			
LPC	37.5	1264	0.14	50.0%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	1.05	0.00	0.00	1.05
Printing Press M850																			
LPC	37.5	1600	0.14	50.0%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	2.65	0.00	0.00	2.65
Heidelberg Sheetfed Press																			
Blanket Cleaner 505	40.125	1600	0.14	50.0%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	7.09	0.00	0.00	0.00	0.00	0.00	0.00	7.09
Low VOC Mrc	40.125	1600	0.14	50.0%	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.13	0.00	0.00	0.00	0.00	0.00	0.00	2.13
Color Wash #1	40.125	1600	0.14	50.0%	0.00%	0.00%	1.30%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.18	0.00	0.00	0.00	0.00	0.18
Ultra Clean #2	40.125	1600	0.14	50.0%	4.00%	3.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.57	0.43	0.00	0.28	0.00	0.00	0.00	1.28
Lithoman Press																			
Emerald AMVP	57	2211	0.15	100%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	8.94	0.00	0.00	8.94
A-60 Odorless and LPC	57	2211	0.14	50.0%	5.00%	0.00%	0.00%	5.00%	0.00%	1.00%	0.00%	1.39	0.00	0.00	1.39	0.00	0.28	0.00	3.06
Misc	57	2211	0.001	75.0%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	1.88%	0.00	0.00	0.00	0.00	0.03	0.00	0.01	0.04
Lithoman Press																			
Emerald AMVP	57	2211	0.15	100%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	8.94	0.00	0.00	8.94
A-60 Odorless and LPC	57	2211	0.14	50.0%	5.00%	0.00%	0.00%	5.00%	0.00%	1.00%	0.00%	1.39	0.00	0.00	1.39	0.00	0.28	0.00	3.06
Misc	57	2211	0.001	100%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	1.88%	0.00	0.00	0.00	0.00	0.04	0.00	0.01	0.05
											Total	**12.56**	**0.425**	**0.184**	**3.07**	**23.4**	**0.556**	**0.013**	**40.2**

Combination HAPs =	**36.6**	**Ton/yr**
Worst case single HAP =	**23.4**	**Ton/yr**

METHODOLOGY

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

HAP Emissions (tons/yr) = Maximum Coverage pounds per MMin^2 * Weight percentage HAP * Flash off * Throughput * Tons per 2000 pounds

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Indiana Department of Environmental Management
Office of Air Quality

Appendix B of Technical Support Document (TSD)

Best Available Control Technology (BACT) Determination

Source Name:	**Courier Kendallville, Inc.**
Source Location:	**2500 Marion Drive, Kendallville, Indiana 46755**
County:	**Noble**
SIC Code:	**2752**
Operation Permit No.:	**F 113-12093-00021**
Operation Permit Issuance Date:	**October 13, 2000**
Significant Permit Revision No.:	**SPR 113-23204-00021**
Permit Reviewer:	**Brian J. Pedersen**

The Indiana Department of Environmental Management (IDEM) has performed the following BACT review for a revision to an existing publication rotogravure printing source owned and operated by Courier Kendallville, Inc., located in Kendallville, Indiana. This revision will permit the construction of one (1) heat set web offset lithographic printing press, identified as Lithoman 3, and an integrated recuperative thermal oxidizer, identified as TNV 1.

The source is located in Noble County which is designated as attainment or unclassifiable for all criteria pollutants. Based upon emission calculations completed by IDEM and the source, the modification will result in a net increase of potential volatile organic compound (VOC) emissions of greater than twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 8-1-6 the source shall reduce VOC emissions from the new facilities, which are not regulated by other provisions of 326 IAC 8, using best available control technology (BACT). The purpose of this BACT Analysis is to evaluate the level of control that constitutes BACT for the affected facilities.

IDEM conducts BACT analyses in accordance with the steps discussed, as follows:

1. Identify all potentially available control options

The first step in evaluating potential applicable control technologies involved a review of control technology determinations made for permitted heatset web lithographic printing sources. The U.S. EPA's RACT/BACT/LAER clearinghouse (RBLC) database was searched for the purpose of identifying comparable sources that have implemented BACT for the affected facilities. This search was performed in the following steps:

(a) A search was first conducted by the same SIC Group as for the source (275 – Commercial Printing). Thirteen (13) publication rotogravure printing sources were identified in the RBLC database for the past ten (10) years. Three (3) sources out of the thirteen (13) identified sources performed a BACT analysis for the purpose of analyzing heatset web lithographic printing press operations. Since this type of printing operation is representative of the subject facilities at Courier Kendallville, Inc., these three (3) sources were included in the list of comparable sources. The three (3) identified sources were two (2) Quad Graphics, Inc. plants in Oklahoma and one (1) Quad/Graphics, Inc. plant in Martinsburg, WV. The BACT or LAER determination has been based on use of add-on control devices at the three (3) sources. All three (3) sources have used 97.5% control efficiency through the use of an oxidizer for VOC control as BACT.

(b) Finally, a RBLC search was conducted specifically searching for printing-publication (No.: 41.022) and printing/publication (No.:41.023) process type. Twenty two (22) printing-publication process types and fourteen (14) printing/publication process type sources were identified. Thirteen (13) sources out of the thirty six (36) identified sources performed a BACT analysis for the purpose of

analyzing heatset web lithographic printing press operations. Since this type of printing operation is representative of the subject facilities at Courier Kendallville, Inc., these thirteen (13) sources were included in the list of comparable sources. The BACT or LAER determinations at the thirteen (13) sources are summarized in Table 1. IDEM also reviewed the RBLC Clearing house for other determinations for coating or related operations using pollution control devices on or after January 1, 2000. These determinations are summarized in Table 2.

With one exception, the BACT or LAER determination has been based on the use of an add-on control device, frequently combined with requirements of low VOC fountain solution (generally < 5% VOC in the applied fountain solution) and low (30% VOC or less) or low vapor pressure (VOC composite vapor pressure of 10 mm Hg or less at 20^{o}C) cleaning solvents. Review of Table 1 and 2 reveals that add-on control devices with destruction efficiencies from 90% to 98% have been established as BACT or LAER for variety of VOC sources, including heatset lithographic printing operations.

Table 1- BACT and LAER determinations for Heatset Web Lithographic Printing

ID	Facility	Issuance Date	BACT/ LAER	Determination	
	Courier Kendallville, Inc.	Proposed	BACT	98.0% Thermal Oxidizer	The VOC content of the fountain solution shall be no greater than 3% VOC as applied. The blanket and roller washes shall have a vapor pressure no greater than 10 mm Hg at 20ºC or the VOC content shall be limited to 2.5 lbs/gal as applied.
WV-0013	Quadgraphics	8/30/01	BACT	97.5% Thermal Oxidizer	No composition limits specified
WI-0084	Quadgraphics	3/8/99	BACT	97.5% Thermal Oxidizer	No composition limits specified
WI-0140	Quadgraphics	7/13/99	BACT	97.5% Thermal Oxidizer	No limits on VOC content
WI-0153	Quadgraphics	4/26/00	BACT	97.5% Thermal Oxidizer	No composition limits specified
WI-0176	Quadgraphics	8/14/00	BACT	97.5% Thermal Oxidizer	No composition limits specified
OK-0054	Quadgraphics	8/21/01	BACT	97.5% Oxidizer	Only a portion of fugitive VOC emissions from the fountain solution & automatic blanket wash will be captured and controlled thru the thermal oxidizer. Fugitive emissions are limited by VOC content, vapor pressure Limits and work practice procedures. Limits not specified.
OK-0097	Quadgraphics	2/3/04	BACT	97.5% Oxidizer	Only a portion of fugitive VOC emissions from the fountain solution & automatic blanket wash will be captured and controlled thru the thermal oxidizer. Fugitive emissions are limited by VOC content, vapor pressure Limits and work practice procedures. Limits not specified.
II-0070	Quebacor World	3/14/01	LAER	existing oxidizer system must meet 97% destruction; if new afterburner installed, 99% or 98% and 1500 F	Cleaning solution with 5.0 mm Hg VOC composite partial pressure (CPP) at 68 deg. F, or 30% volatile organic matter by wt. and VOC CPP <10 mm of Hg. Fountain solution has no alcohol and VOC = 0.5% by volume as applied.

ID	Facility	Issuance Date	BACT/ LAER	Determination	
IL-0069	Quebecor World	9/6/00	BACT	97% Oxidizer, low vapor pressure or low VOC cleaning solvent, Alcohol free fountain solution	Cleaning solution with 5.0 mm Hg VOC composite partial pressure (CPP) at 68 deg. F, or 30% volatile organic matter by wt. and VOC CPP <10 mm of Hg. Fountain solution has no alcohol and VOC = 0.5% by volume as applied.
TN-0091	World Color	4/14/97	BACT	97% Thermal Oxidizer	VOC emissions limited to 3.51% of the mass of VOC per mass of all ink, fountain solution, coating, and blanket wash used (including water and exempt compounds).
IL-055	Brown Printing Company	3/1/98	LAER	96% Oxidizer, VOC limits on fountain solution and cleaning solution	Chilled reservoir or low VOC fountain solution. Low vapor pressure or low VOC cleaning solution. Limits not specified.
GA-00081	World Color	4/28/98	BACT	95% Oxidizer, VOC limits on coatings and solvents	Limits on VOC content of coatings and solvents not specified. Use of covered containers for rags and towels.
WI-0188	Golden Books Publishing Company	6/24/97	LAER	Use of good operating procedures with solvents used in the cleaning operation.	Use of good operating procedures with solvents used in clean up operations. No composition limits specified.

Table 2- BACT and LAER determinations for other coating sources using VOC control devices

ID	Facility	Issuance Date	BACT /LAER	Determination
MI-0352	Pollard (US) Ltd.	11/3/00	BACT	98% Oxidizer for flexo coater, VOC limits on fountain solution and cleaning solvent
VA-0246	Nynax America Corp.	8/18/00	BACT	97.5% Incinerator
WI-0169	3M	6/22/01	BACT	96.7% Thermal Oxidizer
AL-0191	Hyndai	3/23/04	BACT	95% Thermal Oxidizer
AL-0192	Honda Manufacturing	10/18/02	BACT	95% RTO
WI-0193	Pecheney Plastic Packaging	9/25/02	BACT	95% Catalytic or Regenerative Oxidizer
WI-0189	Curwood, Inc.	6/11/02	BACT	95% Catalytic Oxidation System
CA-0986	Latex Technology	5/7/02	LAER	95% Regenerative Thermal Oxidizer
SC-0074	Kronotex, USA	4/8/02	BACT	95% TCO
CA-0985	Watkins Manufacturing	8/20/01	LAER	95% Thermal Oxidizer
WI-0143	Bemis Films	6/1/01	BACT	95% Catalytic Oxidizer system
FL-0213	Nallite International, Inc	9/26/00	BACT	95% Regenerative Thermal Oxidizer
IN-0103	AM general	6/28/00	BACT	95% RTO
LA-0161	General Motors	3/24/00	BACT	95% Oxidizer
AR-0059	Georgia Pacific Oriented Strandboard	1/7/03	BACT	90% RTO/CTO
TN-0088	Saturn Corporation	6/6/00	BACT	Recuperative Thermal Oxidizer (Efficiency not specified)

ID	Facility	Issuance Date	BACT /LAER	Determination
MI-0351	General Motors	4/2/02	BACT	RTO (Efficiency not specified)
IN-0113	Masterbrand Cabinets, Inc	2/3/03	BACT	RTO (Efficiency not specified)
MI-0280	Depor Industries, Inc	3/27/00	BACT	Recuperative Thermal Oxidizer (Efficiency not specified)

2. BACT Determination

Destruction Efficiency

Although much of the focus on controlling VOC emissions from heatset web offset lithographic printing emphasizes the destruction efficiency of add-on pollution control devices, best available control technology (BACT) for this process involves several key components in addition to add-on controls. These measures need to be considered in the aggregate for the control of VOC emissions from the process, rather than just the add-on control device efficiency. IDEM evaluation of BACT included:

(a) Use of low volatility cleaning solvents to limit solvent evaporation during use;

(b) Work practices for VOC/HAP containing materials to minimize evaporative loses of materials that are not in use;

(c) Operation of press dryers at a negative pressure relative to the surrounding pressroom to effectively capture of the VOCs volatilized in the drying operations;

(d) Use of low-VOC, low-volatility fountain solutions to limit evaporative losses and to ensure effective capture of the VOC emissions for control; and

(e) Operation of a pollution control device that efficiently oxidizes the captured VOCs under all process conditions and also minimizes fuel consumption to limit the generation of greenhouse gases and nitrogen oxides.

In combination with these other control strategies, IDEM believes a control device with a 98% minimum destruction efficiency constitutes BACT.

The destruction efficiency in case of Pollard (US) Ltd. is 98%. The proposed destruction efficiency for Courier Kendallville, Inc. would also be 98%. This is the highest destruction efficiency that has been accepted and/or proposed, as demonstrated in Tables 1 and 2.

Therefore, IDEM proposes a recuperative thermal oxidizer (TNV 1) with minimum VOC destruction efficiency of 98% in conjunction with additional limitations on composition of materials as BACT.

VOC Limitations

Although limits on fountain solutions or cleaning solvents have been included in some BACT determinations, many determinations do not impose any such limitations.

Numerous state and local environmental regulations have also been evaluated to determine what emissions limitations have been promulgated in regulations for the lithographic printing process. Regulations reviewed include the following lithography-specific rules, given in Table 3 below:

Table 3 - Numerous state and local environmental regulations

Agency	Regulation	VOC Limits
San Diego County Air Pollution Control District	Rule 67.16	Ink limited to 300g/l VOC. Cleaning solvent limited to a VOC content of less than 200 grams per liter of material or a VOC vapor pressure of 45 mm of Hg at 20°C or less. Fountain solution limited to 15% VOC by volume
South Coast Air Quality Management District	Rule 1171	Solvents for roller wash-step 2, blanket wash, and on-press components limited to VOC content of 800 grams per liter.
South Coast Air Quality Management District	Rule 1130	Fountain solution limited to VOC content of 80 grams per liter.
San Joaquin Valley Unified Air Pollution Control District	Rule 4607	Limits the cleaning solvent to a VOC content of less than 900 grams per liter of material or a VOC vapor pressure of 25 mm of Hg at 20°C or less. Fountain solution limited to 8% VOC by volume.
Delaware	CAP.24.47	Limits the cleaning solvent to a VOC content of less than 30% by weight or a VOC vapor pressure of 10 mm of Hg at 20°C or less. Fountain solution limited to 3% alcohol substitute VOC by volume.
Illinois	35 IAC 218.407 and 35 IAC 219.407	Limits the cleaning solvent to a VOC content of less than 30% by weight or a VOC vapor pressure of 10 mm of Hg at 20°C or less. Fountain solution limited to 5% alcohol substitute VOC by volume.
Massachusetts	310 CMR 7.26	Limits the cleaning solvent to a VOC content of less than 30% by weight or a VOC vapor pressure of 10 mm of Hg at 20°C or less. No VOC limit for fountain solution, but alcohol prohibited.
Missouri	10 CSR 10-2.340	No limits on cleaning solution. Requires storage of solvents and used towels in closed containers. Fountain solution limited to 10% alcohol substitute VOC by volume.
Missouri	10 CSR 10-5.442	Limits the cleaning solvent to a VOC content of less than 30% by weight or a VOC vapor pressure of 10 mm of Hg at 20°C or less. Fountain solution limited to 5% alcohol substitute VOC by volume.
New Hampshire	Env-A 1204.37	No limits on cleaning solution. Requires storage of solvents and used towels in closed containers. Fountain solution limited to 5% alcohol substitute VOC by volume.
New York	6 §234.3	No limits on cleaning solution. Fountain solution limited to 15% VOC by volume.
Tennessee	1200-3-18-.43	Limits the cleaning solvent to a VOC content of less than 30% by weight or a VOC vapor pressure of 10 mm of Hg at 20°C or less. Fountain solution limited to 4.6% alcohol substitute VOC by volume.
Texas	30 TAC 115.442	Limits the cleaning solvent to a VOC content of less than 50% by weight (70% if using shop towel management processes) or a VOC vapor pressure of 10 mm of Hg at 20°C or less. Fountain solution limited to 3% alcohol substitute VOC by volume.
Virginia	9 VAC 5-40-7820	Limits the cleaning solvent to a VOC content of less than 30% by weight or a VOC vapor pressure of 10 mm of Hg at 20°C or less. Fountain solution limited to 5% alcohol substitute VOC by volume.
Wisconsin	NR 422.142	Limits the cleaning solvent to a VOC content of less than 30% by weight or a VOC vapor pressure of 10 mm of Hg at 20°C or less. Up to 55 gallons per year of noncompliant solvents may be used. Fountain solution limited to 10% alcohol substitute VOC by volume.

The materials limitations proposed for BACT are as follows:

(a) The VOC content of the fountain solution shall be no greater than 3% VOC as applied;

(b) The cleanup solvents shall have a vapor pressure no greater than 10 mmHg at 20^{o}C or the VOC content shall be limited to 2.5 lb/gal as applied.

The 3% VOC limit in fountain solution is as stringent as the lithographic printing regulations for these jurisdictions, and are comparable to those included in other BACT determinations. For the cleanup solvents, the limit of 10 mm of Hg at 20°C or less (or) VOC content of 2.5 lb/gal (299 grams/liter) is also as stringent as the lithographic printing regulations for these jurisdictions, and are comparable to those included in other BACT determinations. The source has expressed that it is going to use 10 mm of Hg at 20°C or less limit for cleaning solvents.

Capture Efficiency

The capture efficiencies for the ink oil, fountain solution, and cleaning solvent VOCs are based on the published factors contained in EPA's draft Guideline Series document "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" and "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994). Press emissions will be determined from the combination of VOC usage in each of the process materials, the appropriate retention and/or capture efficiencies, and the destruction efficiency of the oxidizer.

Based on US EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994), the capture efficiencies shall be assumed as follows:

(1) 100 percent capture, by weight, of the VOC in press ready inks;

(2) 70 percent capture, by weight, of the VOC in press ready fountain solutions; and

(3) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.

The press dryers are operated at negative pressure relative to the surrounding pressroom, with all dryer exhaust directed to the thermal oxidizer, to ensure 100% capture of the VOCs resulting from press ready inks. To capture emissions from fountain solution and automatic cleaning solvent, a completely separate capture system would need to be constructed, which is not economically feasible. IDEM is not aware of any requirements (including BACT or LAER determinations) for heatset lithographic printing where a total enclosure has been required and IDEM does not believe such an approach is warranted in this case.

In addition, because the fountain solution and automatic cleaning solvent are applied on the press several feet away from the dryer, obtaining a higher capture efficiency is not practical, since a total enclosure, with a significant increase in exhaust airflow and, therefore, a significant increase in the size of the pollution control system would be required to handle the increased flow. This would also result in significantly lower concentrations at the inlet of the control device, which would negatively impact the destruction efficiency.

The destruction efficiency of 98% in conjunction with the materials proposed for use on the one (1) heatset web press are consistent with the materials that have served as the basis for BACT or LAER at the other printing operations. The most recent LAER determination (IL-0070, March 14, 2001) was based on the use of 99% efficient pollution control device and limitations on the VOC content and/or vapor pressure of the press ready fountain solution and cleaning solvents. The limitations on these materials, namely fountain solution used for the heatset operations, shall be limited to no greater than 3% VOC applied, and cleaning solvent with a vapor pressure limited to 10 mmHg or less at 20 ^{o}C or VOC content limited to 2.5 lb/gal.

IDEM proposes that BACT for the one (1) heat set web offset lithographic printing press, identified as Lithoman 3, shall be as follows:

(a) The exhaust shall be vented to the one (1) integrated recuperative thermal oxidizer (TNV 1) with a minimum of 98% destruction efficiency for VOC as demonstrated by achieving a VOC outlet concentration of 20ppmv or less as hexane, minus methane and ethane;

(b) The VOC content of the fountain solution shall be no greater than 3% VOC as applied;

(c) The cleanup solvents shall have a vapor pressure no greater than 10 mmHg at 20^{o}C or the VOC content shall be limited to 2.5 lb/gal as applied; and

(d) The capture efficiencies shall be required, based on US EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994)

(1) 100 percent capture, by weight, of the VOC in press ready inks;

(2) 70 percent capture, by weight, of the VOC in press ready fountain solutions; and

(3) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.

Compliance with the above limits and conditions will satisfy the requirements of 326 IAC 8-1-6.

Appendix C: Emissions Calculations
VOC and HAPs From Book Binding Operations

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Drive, Kendallville, Indiana 46755
Permit Number: SPR 113-23204-00021
Plt ID: 113-00021
Reviewer: Brian J. Pedersen
Application Date: July 9, 2006

Norm Binder

	Amount (Lbs)		VOC/HAP % by Wt.		Emission Factor		VOC/HAP Emissions	
Cover Glue Hot 2H782	129,800	x	0.0010	x	1	=	129.80	lbs
Side Glue Hot 2H858	7,921	x	0.0010	x	1	=	7.92	lbs
Primer Cold 46939	10,800	x	0.00208	x	1	=	22.46	lbs
Total Actual							**160.19**	**lbs**
Total Actual							**0.02**	**lbs/hr**
Hours of Operation	7378	hrs						
Total Potential							**380.38**	**lbs**
							0.19	**tpy**

Kolbus Binder

	Amount (Lbs)		VOC/HAP % by Wt.		Emission Factor		VOC/HAP Emissions	
Cover Glue Hot 2H662	50,000	x	0.0014	x	1	=	70.00	lbs
Side Glue Hot 2H858	10,078	x	0.0010	x	1	=	10.08	lbs
Total Actual							**80.08**	**lbs**
Total Actual							**0.01**	**lbs/hr**
Hours of Operation	6361	hrs						
Total Potential							**110.28**	**lbs**
							0.06	**tpy**

K2

	Amount (Lbs or Gals)		VOC/HAP % by Wt.		Emission Factor		VOC/HAP Emissions	
Spine Glue Hot 2H932	60,207	x	0.0010	x	1	=	60.21	lbs
Headband Paste Hot V3869EN	132	x	0.00316	x	1	=	0.42	lbs
Casing-In Paste 834-77-1	13,504	x	0	x	1	=	-	lbs
Total Actual							**60.62**	**lbs**
Total Actual							**0.01**	**lbs/hr**
Hours of Operation	4109	hrs						
Total Potential							**129.24**	**lbs**
							0.06	**tpy**

Corrona (New Binder)

	Amount (Lbs)		VOC/HAP % by Wt.		Emission Factor		VOC/HAP Emissions	
Hot Melt HL3178X	146,025	x	0.00213	x	1	=	311.03	lbs
Primer WB1798	21,061	x	0.0051	x	1	=	107.41	lbs
Total Actual							**418.44**	**lbs**
Total Actual							**0.06**	**lbs/hr**
Hours of Operation	7378	hrs						
Total Potential							**496.83**	**lbs**
							0.25	**tpy**
						Total	**0.558**	**tpy**

Methodology
Potential to emit (tons/yr) = Amount (Pounds) * (VOC/HAP % by Wt.) *(8760 hours/Hours of Operation) * (1 ton/2000 pounds)

What if you are not satisfied with this decision and you want to file an appeal?

Who may file an appeal?
The decision described in the accompanying Notice of Decision may be administratively appealed. Filing an appeal is formally known as filing a "Petition for Administrative Review" to request an "administrative hearing."

If you object to this decision issued by the Indiana Department of Environmental Management (IDEM) and are: 1) the person to whom the decision was directed, 2) a party specified by law as being eligible to appeal, or 3) aggrieved or adversely affected by the decision, you are entitled to file an appeal. (An aggrieved or adversely affected person is one who would be considered by the court to be negatively impacted by the decision. If you file an appeal because you feel that you are aggrieved, it will be up to you to demonstrate in your appeal how you are directly impacted in a negative way by the decision).

The Indiana Office of Environmental Adjudication (OEA) was established by state law – see Indiana Code (IC) 4-21.5-7 – and is a separate state agency independent of IDEM. The jurisdiction of the OEA is limited to the review of environmental pollution concerns or any alleged technical or legal deficiencies associated with the IDEM decision making process. Once your request has been received by OEA, your appeal may be considered by an Environmental Law Judge.

What is required of persons filing an appeal?
Filing an appeal is a legal proceeding, so it is suggested that you consult with an attorney. Your request for an appeal must include your name and address and identify your interest in the decision (Or, if you are representing someone else, his or her name and address and their interest in the decision). In addition, please include a photocopy of the accompanying Notice of Decision or list the permit number and name of the applicant, or responsible party, in your letter.

Before a hearing is granted, you must identify the reason for the appeal request and the issues proposed for consideration at the hearing. You also must identify the permit terms and conditions that, in your judgment, would appropriately satisfy the requirements of law with respect to the IDEM decision being appealed. That is, you must suggest an alternative to the language in the permit (or other order, or decision) being appealed, and your suggested changes must be consistent with all applicable laws (See Indiana Code 13-15-6-2) and rules (See Title 315 of the Indiana Administrative Code, or 315 IAC).

The effective date of this agency action is stated on the accompanying Notice of Decision (or other IDEM decision notice). If you file a "Petition for Administrative Review" (appeal), you may wish to specifically request that the action be "stayed" (temporarily halted) because most appeals do not allow for an automatic "stay." If, after an evidentiary hearing, a "stay" is granted, the IDEM-approved action may be halted altogether, or only allowed to continue in part, until a final decision has been made regarding the appeal. However, if the action is not "stayed" the IDEM-approved activity will be allowed to continue during the appeal process.

(See reverse side)

Where can you file an appeal?
If you wish to file an appeal, you must do so in writing. There are no standard forms to fill out and submit, so you must state your case in a letter (called a petition for administrative review) to the Indiana Office of Environmental Adjudication (OEA). Do not send the original copy of your appeal request to IDEM. Instead, send or deliver your letter to:

The Indiana Office of Environmental Adjudication
100 North Senate Ave.
Indiana Government Center North
Room 1049
Indianapolis, IN 46204

If you file an appeal, also please send a copy of your appeal letter to the IDEM contact person identified in the Notice of Decision, and to the applicant (person receiving an IDEM permit, or other approval).

Your appeal (petition for administrative review) must be received by the Office of Environmental Adjudication in a timely manner. Different types of permit approvals have different deadlines for filing an appeal. The accompanying Notice of Decision (NOD) explains how to determine the due date for filing an appeal for this particular permit decision. To ensure that you meet this filing requirement, your appeal request must be:

1) Delivered in person to the OEA by the close-of-business on the due date. (If the due date falls on a day when the Office of Environmental Adjudication (OEA) is closed for the weekend or for a state holiday, then your petition will be accepted on the next business day on which OEA is open.); or
2) Given to a private carrier who will deliver it to the OEA on your behalf, (and from whom you must obtain a receipt dated on or before the due date); or
3) For those appeal requests sent by U.S. Mail, your letter must be postmarked by no later than midnight of the due date; or
4) Faxed to the OEA at 317/233-9372 before the close-of-business of the due date, provided that the original signed "Petition for Administrative Review" is also sent, or delivered, to the OEA in a timely manner.

What are the costs associated with filing an appeal?
The OEA does not charge a fee for filing documents for an administrative review or for the use of its hearing facilities. However, OEA does charge a fifteen cent ($.15) per page fee for copies of any documents you may request. Another cost that could be associated with your appeal would be for attorney's fees. Although you have the option to act as your own attorney, the administrative review and associated hearing are complex legal proceedings; therefore, you should consider whether your interests would be better represented by an experienced attorney.

What can you expect from the Office of Environmental Adjudication (OEA) after you file for an appeal?
The OEA will provide you with notice of any prehearing conferences, preliminary hearings, hearings, "stays," or orders disposing of the review of this decision. In addition, you may contact the OEA by phone at 317/232-8591 with any scheduling questions. However, technical questions should be directed to IDEM at the number indicated on the Notice of Decision.

Do not expect to discuss details of your case with the OEA other than in a formal setting such as a prehearing conference, a formal hearing, or a settlement conference. The OEA is not allowed to discuss a case without all sides being present. All parties to the proceeding are expected to appear at the initial prehearing conference.