



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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Jessica Ortiz
R. R. Donnelley & Sons Company
600 West State Road 32
Crawfordsville, IN 47933-8964

Re: 107-23347-00052
First Significant Permit Modification to
Part 70 Permit 107-5963-00052

Dear Ms. Ortiz,

R. R. Donnelley & Sons Company was issued a Part 70 operating permit on June 21, 2002 for a book printing and binding operation located at 1009 Sloan Street, Crawfordsville, IN 47933-2743. An application requesting changes to this permit was received on June 28, 2006. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes to re-evaluate the volatile organic compounds (VOC) best available control technology (BACT) determination for six (6) existing printing presses (Presses 260, 261, 262, 268, 269 and 273) when operating as nonheatset presses.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Allen R. Davidson or extension 3-5693, or dial (317) 233-5693.

Sincerely,

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments
ARD

cc: File - Montgomery County
Montgomery County Health Department
Air Compliance Section - Jennifer Schick
Compliance Data Section
Administrative and Development



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

R.R. Donnelley & Sons Company
1009 Sloan Street
Crawfordsville, IN 47933-2743

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T107-5963-00052	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 21, 2002 Expiration Date: June 21, 2007
Administrative Amendment 107-17119-00052	Issuance Date: February 4, 2003
Significant Permit Modification 107-16731-00052	Issuance Date: March 28, 2003
Administrative Amendment 107-17255-00052	Issuance Date: April 8, 2003
Administrative Amendment 107-17454-00052	Issuance Date: July 25, 2003
Administrative Amendment 107-18767-00052	Issuance Date: March 15, 2004
Minor Permit Modification 107-21171-00052	Issuance Date: August 5, 2005
Minor Source Modification 107-22646-00052	Issuance Date: April 3, 2006
Minor Permit Modification 107-22728-00052	Issuance Date: June 1, 2006
Administrative Amendment 107-22827-00052	Issuance Date: June 21, 2006
Significant Permit Modification 107-23347-00052	
Issued by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: June 21, 2007



TABLE OF CONTENTS

A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
B	GENERAL CONDITIONS	11
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]	
B.17	Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5]	
B.22	Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.25	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]	
C	SOURCE OPERATION CONDITIONS	21
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Stack Height [326 IAC 1-7]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.9	Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
- C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]
- C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

Stratospheric Ozone Protection

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Natural Gas Fired Boilers 30

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

- D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]
- D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

- D.1.4 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - Paper Trim Cyclones and Dust Collectors 32

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

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.3 Particulate Matter (PM)

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

- D.2.4 Visible Emissions Notations

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

- D.2.5 Record Keeping Requirements

D.3 FACILITY OPERATION CONDITIONS - Printing Presses 34

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

- D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-7-10.5(d)(5)(A)]
- D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]
- D.3.3 Clean-up Solvent VOC Emissions Control
- D.3.4 VOC Emissions
- D.3.5 Particulate Matter (PM) [326 IAC 6-3]
- D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.3.7 Particulate Matter (PM)
- D.3.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
- D.3.9 Volatile Organic Compounds (VOC)
- D.3.10 Thermal Oxidizers
- D.3.11 Thermal Oxidizer Temperature

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

- D.3.12 Parametric Monitoring
- D.3.13 Particulate Matter Monitoring

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

- D.3.14 Record Keeping Requirements
- D.3.15 Reporting Requirements

Certification	43
Emergency Occurrence Report	44
Natural Gas Fired Boiler Certification	46
Quarterly Report	47
Quarterly Report	48
Quarterly Deviation and Compliance Monitoring Report	49
Quarterly Report	51

PROPOSED

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a book printing and binding operation.

Source Address:	1009 Sloan Street, Crawfordsville, IN 47933-2743
Mailing Address:	1009 Sloan Street, Crawfordsville, IN 47933-2743
Phone Number:	(765) 364 -1300
SIC Code:	2732
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD

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

This book printing and binding operation consists of the following emission units and pollution control devices:

North Plant:

- (1) Four (4) natural gas or propane fired boilers, with a maximum rating of 20.9 MMBtu (million British thermal units) per hour each:
 - (a) Boiler #1(N) with emissions exhausting through stack SB-4A(N).
 - (b) Boiler #2(N) with emissions exhausting through stack SB-4B(N).
 - (c) Boiler #3(N) with emissions exhausting through stack SB-4C(N).
 - (d) Boiler #4(N) with emissions exhausting through stack SB-4D(N).
- (2) One (1) natural gas or propane fired boiler, with a maximum rating of 2.56 MMBtu (million British thermal units) per hour: Boiler #5(N) with emissions exhausting through stack SB-4E(N).
- (3) Four (4) Paper Trim Cyclones:
 - (a) Paper Trim Cyclone #1(N) emissions exhausting through stack SBP-5H(N).
 - (b) Paper Trim Cyclone #2(N) emissions exhausting through stack SBP-5I(N).
 - (c) Paper Trim Cyclone #3(N) emissions exhausting through stack SBP-5J(N).
 - (d) Paper Trim Cyclone #4(N) emissions exhausting through stack SBP-5K(N).

- (4) Two (2) Paper Dust Collectors:
 - (a) Dust Collector #1(N) consists of a cyclone followed by a baghouse for particulate control and is exhausted through SD-6A(N).
 - (b) Dust Collector #2(N) consists of a baghouse for particulate control and is exhausted through SD-6B(N).
- (5) Two (2) web offset lithographic printing presses, controlled by one (1) 7.6 MMBtu per hour natural gas fired thermal oxidizer ("North Oxidizer") exhausting to one (1) stack identified as SP-5Y(N) in heatset mode, including:
 - (a) One (1) Mitsubishi web offset lithographic printing press with two (2) units and two (2) webs identified as Press 268 with a maximum line speed of 1600 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, exhausting to Vent SP-5AA(N) in nonheatset mode; and
 - (b) One (1) Toshiba web offset lithographic printing Press with four (4) units and two (2) webs identified as Press 269 with a maximum line speed of 1600 feet per minute and a maximum printing width of 50 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, exhausting to Vent SP-5BB(N) in nonheatset mode.
- (6) One (1) Hantscho web offset lithographic printing Press with two (2) units and two (2) webs identified as Press 240 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5R(N). The press may operate in either a heatset or nonheatset mode.
- (7) One (1) KBA Compacta web offset lithographic printing Press with two (2) units and two (2) webs identified as Press 281 with a maximum line speed of 1100 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5S(N). The press may operate in either a heatset or nonheatset mode.
- (8) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 245 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(N). The press may operate in either a heatset or nonheatset mode.
- (9) One (1) Timson web offset lithographic printing press with one (1) unit and one (1) web identified as Press 242 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Z(N). The press may operate in either a heatset or nonheatset mode.
- (10) One (1) Timson web offset lithographic printing press with one (1) unit and one (1) web identified as Press 243 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5AA(N). The press may operate in either a heatset or nonheatset mode.
- (11) One (1) Harris web offset lithographic printing press with two (2) units and two (2) webs identified as Press 285 with a maximum line speed of 825 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(N). The press may operate in either a heatset or nonheatset mode.

- (12) One (1) Harris web offset lithographic printing press with two (2) units and two (2) webs identified as Press 286 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5L(N). The press may operate in either a heatset or nonheatset mode.
- (13) One (1) Harris web offset lithographic printing press with four (4) units and two (2) webs identified as Press 287 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(N). The press may operate in either a heatset or nonheatset mode.
- (14) One (1) Harris web offset lithographic printing press with four (4) units and two (2) webs identified as Press 288 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5N(N). The press may operate in either a heatset or nonheatset mode.
- (15) One (1) Harris web offset lithographic printing press with four (4) units and two (2) webs identified as Press 289 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5O(N). The press may operate in either a heatset or nonheatset mode.
- (16) Four (4) UV sheetfed offset lithographic presses:
 - (a) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 232 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.
 - (b) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 233 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.
 - (c) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 238 with a maximum line speed of 434 feet per minute and a maximum printing width of 40 inches including six (6) units and coater, exhausting to one (1) stack SP-5V(N) used as cooling air for UV lamps.
 - (d) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 239 with a maximum line speed of 473 feet per minute and a maximum printing width of 40 inches including two (2) units and coater, exhausting to one (1) stack SP-5W(N) used as cooling air for UV lamps.

South Plant:

- (1) Three (3) natural gas or propane fired boilers, with a maximum rating of 25.1 MMBtu (million British thermal units) per hour each:
 - (a) Boiler #1(S) with emissions exhausting through stack SB-4A(S).
 - (b) Boiler #2(S) with emissions exhausting through stack SB-4B(S).
 - (c) Boiler #3(S) with emissions exhausting through stack SB-4C(S).
- (2) Four (4) Paper Trim Cyclones:
 - (a) Paper Trim Cyclone #1(S) emissions exhausting through stack SBP-5E(S).

- (b) Paper Trim Cyclone #2(S) emissions exhausting through stack SBP-5E(S).
 - (c) Paper Trim Cyclone #3(S) emissions exhausting through stack SBP-5E(S).
 - (d) Paper Trim Cyclone #4(S) emissions exhausting through stack SBP-5E(S).
- (3) Two (2) Paper Dust Collectors:
- (a) Dust Collector #1(S) consists of a two (2) cyclones each followed by a baghouse (2 total) for particulate control and are exhausted through SD-6A(S) and new exhaust point SD6C(S).
 - (b) Dust Collector #2(S) consists of a baghouse for particulate control and is exhausted through SD-6B(S).
- (4) One (1) Mitsubishi web offset lithographic printing press with four (4) units and two (2) webs identified as Press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5N(S) in nonheatset mode.
- (5) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 270 with a maximum line speed of 807 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to SP-5F(S). The press may operate in either a heatset or nonheatset mode.
- (6) One (1) Cottrell web offset lithographic printing press with four (4) units and two (2) webs identified as Press 272 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5D(S). The press may operate in either a heatset or nonheatset mode.
- (7) One (1) Mitsubishi web offset lithographic printing press with four (4) units and two (2) webs identified as Press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5L(S) in nonheatset mode.
- (8) One (1) Cottrell web offset lithographic printing press with four (4) units and two (2) webs identified as Press 276 with a maximum line speed of 1200 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5E(S). The press may operate in either a heatset or nonheatset mode.
- (9) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5I(S) in nonheatset mode.

- (10) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 261 with a maximum line speed of 1500 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5J(S) in nonheatset mode.
- (11) One (1) Hantscho web offset lithographic printing press with one (1) unit and one (1) web identified as Press 290 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5G(S). The press may operate in either a heatset or nonheatset mode.
- (12) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 291 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5H(S). The press may operate in either a heatset or nonheatset mode.
- (13) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 293 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(S). The press may operate in either a heatset or nonheatset mode.
- (14) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 294 with a maximum line speed of 1076 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(S). The press may operate in either a heatset or nonheatset mode.
- (15) One (1) Hantscho web offset lithographic printing press with two (2) units and two (2) webs identified as Press 295 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5P(S). The press may operate in either a heatset or nonheatset mode.
- (16) One (1) Harris web offset lithographic printing press with two (2) units and two (2) webs identified as Press 296 with a maximum line speed of 860 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(S). The press may operate in either a heatset or nonheatset mode.
- (17) One (1) Heidelberg sheetfed offset lithographic press identified as Press 258 with a maximum line speed of 505 feet per minute and a maximum printing width of 40.5 inches including six (6) units and coater, exhausting to one (1) stack SP-5R(S) used as cooling air for electric heaters.
- (18) One (1) In-line Stainer 192 used for edge staining paper using low pressure-high volume spray coating and using dry filters for overspray control and exhausting through stack BS-4X(N).
- (19) One (1) nonheatset, sheet-fed, offset lithographic printing press, identified as Press 250, constructed in 2006, exhausting to stack SP-5U(s), capacity: 13,000 sheets (14.56 million square inches) per hour.

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

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements.

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

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

PROPOSED

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T107-5963-00052, 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 2-7-7]

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

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

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

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

- (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
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, IL 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (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
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

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

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification, which shall be submitted by the Permittee, does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions. The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements, which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]

- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

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

- (a) All terms and conditions of permits established prior to T107-5963-00052 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 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, IL 60604-3590

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which:

- (a) has a maximum process weight rate less than 100 pounds per hour, and
- (b) the methods in 326 IAC 6-3-2(b) through (d) do not apply

shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).
- All required notifications shall be submitted to:
- Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, IN 46204-2251
- The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-41, 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. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source 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 2-7-5(1)] [326 IAC 2-7-6(1)]

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

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
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 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 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5] [326 IAC 2-7-6]

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
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

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

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

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

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

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 documents submitted pursuant to this condition do require the certification by the a responsible official as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, IN 46204-2251

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

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long

as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a "project" (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(jii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

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

Stratospheric Ozone Protection

C.20 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.

PROPOSED

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: (Natural gas fired boilers)

North Plant:

- (1) Four (4) natural gas or propane fired boilers, with a maximum rating of 20.9 MMBtu (million British thermal units) per hour each:
 - (a) Boiler #1(N) with emissions exhausting through stack SB-4A(N).
 - (b) Boiler #2(N) with emissions exhausting through stack SB-4B(N).
 - (c) Boiler #3(N) with emissions exhausting through stack SB-4C(N).
 - (d) Boiler #4(N) with emissions exhausting through stack SB-4D(N).
- (2) One (1) natural gas or propane fired boiler, with a maximum rating of 2.56 MMBtu (million British thermal units) per hour: Boiler #5(N) with emissions exhausting through stack SB-4E(N).

South Plant:

- (1) Three (3) natural gas or propane fired boilers, with a maximum rating of 25.1 MMBtu (million British thermal units) per hour each:
 - (a) Boiler #1(S) with emissions exhausting through stack SB-4A(S).
 - (b) Boiler #2(S) with emissions exhausting through stack SB-4B(S).
 - (c) Boiler #3(S) with emissions exhausting through stack SB-4C(S).

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

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

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Particulate limitations for Boilers #1(N), #2(N), #3(N), #4(N), #5(N), #1(S), # 2(S) and #3(S) shall be 0.3315 pound particulate matter per MMBtu. Compliance with this limitation is confirmed based on the total PM emission factor for natural gas fired boilers as found in Table 1.4-2 of Supplemental D, March 1998, to the 5th Edition of AP-42, January 1995, of 7.6 pounds per million cubic feet of gas burned.

This limitation is based on the following equation:

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

where

C = 50 u/m³

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height (ft)

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Sulfur content limits for Boiler #1(N), Boiler #2(N), Boiler #3(N), Boiler #4(N), Boiler #5(N), Boiler #1(S), Boiler #2(S) and Boiler #3(S) are not applicable, because they are not capable of burning #2 fuel oil and burn only natural gas and propane and the SO₂ PTE less than 25 tpy.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.1.4 Reporting Requirements

The Permittee shall certify, on the form provided, that natural gas was fired in the boiler at all times during each quarter. Alternatively, the Permittee shall report the number of days during which an alternative fuel was burned during each quarter.

PROPOSED

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Paper Trim Cyclones and Dust Collectors

North:

- (3) Four (4) Paper Trim Cyclones:
 - (a) Paper Trim Cyclone #1(N) emissions exhausting through stack SBP-5H(N).
 - (b) Paper Trim Cyclone #2(N) emissions exhausting through stack SBP-5I(N).
 - (c) Paper Trim Cyclone #3(N) emissions exhausting through stack SBP-5J(N).
 - (d) Paper Trim Cyclone #4(N) emissions exhausting through stack SBP-5K(N).
- (4) Two (2) Paper Dust Collectors:
 - (a) Dust Collector #1(N) consists of a cyclone followed by a baghouse for particulate control and is exhausted through SD-6A(N).
 - (b) Dust Collector #2(N) consists of a baghouse for particulate control and is exhausted through SD-6B(N).

South:

- (2) Four (4) Paper Trim Cyclones:
 - (a) Paper Trim Cyclone #1(S) emissions exhausting through stack SBP-5E(S).
 - (b) Paper Trim Cyclone #2(S) emissions exhausting through stack SBP-5E(S).
 - (c) Paper Trim Cyclone #3(S) emissions exhausting through stack SBP-5E(S).
 - (d) Paper Trim Cyclone #4(S) emissions exhausting through stack SBP-5E(S).
- (3) Two (2) Paper Dust Collectors:
 - (a) Dust Collector #1(S) consists of a two (2) cyclones each followed by a baghouse (2 total) for particulate control and are exhausted through SD-6A(S) and new exhaust point SD6C(S).
 - (b) Dust Collector #2(S) consists of a baghouse for particulate control and is exhausted through SD-6B(S).

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Particulate emission limitations for Paper Trim Cyclones #1(N), #2(N), #3(N), #4(N), #1(S), #2(S) #3(S) and #4(S) shall be 10.4 pounds per hour per cyclone, established as E in the following formula:

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

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

The Permittee shall demonstrate compliance with this limit based on an emission factor of one pound of dust emitted per ton of paper handled.

Particulate emission limitation for Dust Collectors #1(N), #2(N), #1(S) and #2(S) shall be 0.551 pound per hour per Dust Collector which shall be achieved by the use of baghouse pollution control devices, in accordance with Section C.1-Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour 326 IAC 6-3-2(c).

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Particulate Matter (PM)

The baghouses for PM control shall be in operation and control emissions from the Paper Dust Collectors at all times that the Paper Dust Collectors are in operation.

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

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhausts for stacks identified as SBP-5H(N), SBP-5I(N), SBP-5J(N), SBP-5K(N), and SBP-5E(S) for Paper Trim Cyclones #1(N), #2(N), #3(N), #4(N), #1(S), #2(S), #3(S) and #4(S) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain a daily record of visible emission notations of the stack exhausts from stacks identified as SBP-5H(N), SBP-5I(N), SBP-5J(N), SBP-5K(N), and SBP-5E(S) for Paper Trim Cyclones #1(N), #2(N), #3(N), #4(N), #1(S), #2(S), #3(S) and #4(S). The Permittee shall include in its daily record any days when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITION

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

North Plant:

- (5) Two (2) web offset lithographic printing presses, controlled by one (1) 7.6 MMBtu per hour natural gas fired thermal oxidizer ("North Oxidizer") exhausting to one (1) stack identified as SP-5Y(N) in heatset mode, including:
 - (a) One (1) Mitsubishi web offset lithographic printing press with two (2) units and two (2) webs identified as Press 268 with a maximum line speed of 1600 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, exhausting to Vent SP-5AA(N) in nonheatset mode; and
 - (b) One (1) Toshiba web offset lithographic printing Press with four (4) units and two (2) webs identified as Press 269 with a maximum line speed of 1600 feet per minute and a maximum printing width of 50 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, exhausting to Vent SP-5BB(N) in nonheatset mode.
- (6) One (1) Hantscho web offset lithographic printing press with two (2) units and two (2) webs identified as Press 240 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5R(N). The press may operate in either a heatset or nonheatset mode.
- (7) One (1) KBA Compacta web offset lithographic printing press with two (2) units and two (2) webs identified as Press 281 with a maximum line speed of 1100 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5S(N). The press may operate in either a heatset or nonheatset mode.
- (8) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 245 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(N). The press may operate in either a heatset or nonheatset mode.
- (9) One (1) Timson web offset lithographic printing press with one (1) unit and one (1) web identified as Press 242 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Z(N). The press may operate in either a heatset or nonheatset mode.
- (10) One (1) Timson web offset lithographic printing press with one (1) unit and one (1) web identified as Press 243 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5AA(N). The press may operate in either a heatset or nonheatset mode.
- (11) One (1) Harris web offset lithographic printing press with two (2) units and two (2) webs identified as Press 285 with a maximum line speed of 825 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(N). The press may operate in either a heatset or nonheatset mode.
- (12) One (1) Harris web offset lithographic printing press with two (2) units and two (2) webs identified as Press 286 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5L(N). The press may operate in either a heatset or nonheatset mode.

Facility Description [326 IAC 2-7-5(15)]: Printing Presses (Continued)

- (13) One (1) Harris web offset lithographic printing press with four (4) units and two (2) webs identified as Press 287 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(N). The press may operate in either a heatset or nonheatset mode.
- (14) One (1) Harris web offset lithographic printing press with four (4) units and two (2) webs identified as Press 288 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5N(N). The press may operate in either a heatset or nonheatset mode.
- (15) One (1) Harris web offset lithographic printing press with four (4) units and two (2) webs identified as Press 289 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5O(N). The press may operate in either a heatset or nonheatset mode.
- (16) Four (4) UV sheetfed offset lithographic presses:
- (a) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 232 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.
 - (b) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 233 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.
 - (c) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 238 with a maximum line speed of 434 feet per minute and a maximum printing width of 40 inches including six (6) units and coater, exhausting to one (1) stack SP-5V(N) used as cooling air for UV lamps.
 - (d) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 239 with a maximum line speed of 473 feet per minute and a maximum printing width of 40 inches including two (2) units and coater, exhausting to one (1) stack SP-5W(N) used as cooling air for UV lamps.

South Plant:

- (4) One (1) Mitsubishi web offset lithographic printing press with four (4) units and two (2) webs identified as Press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5N(S) in nonheatset mode.
- (5) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 270 with a maximum line speed of 807 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to SP-5F(S). The press may operate in either a heatset or nonheatset mode.

Facility Description [326 IAC 2-7-5(15)]: Printing Presses (Continued)

- (6) One (1) Cottrell web offset lithographic printing press with four (4) units and two (2) webs identified as Press 272 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5D(S). The press may operate in either a heatset or nonheatset mode.
- (7) One (1) Mitsubishi web offset lithographic printing press with four (4) units and two (2) webs identified as Press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5L(S) in nonheatset mode.
- (8) One (1) Cottrell web offset lithographic printing press with four (4) units and two (2) webs identified as Press 276 with a maximum line speed of 1200 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5E(S). The press may operate in either a heatset or nonheatset mode.
- (9) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5I(S) in nonheatset mode.
- (10) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 261 with a maximum line speed of 1500 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5J(S) in nonheatset mode.
- (11) One (1) Hantscho web offset lithographic printing press with one (1) unit and one (1) web identified as Press 290 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5G(S). The press may operate in either a heatset or nonheatset mode.
- (12) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 291 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5H(S). The press may operate in either a heatset or nonheatset mode.
- (13) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 293 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(S). The press may operate in either a heatset or nonheatset mode.
- (14) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 294 with a maximum line speed of 1076 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(S). The press may operate in either a heatset or nonheatset mode.

Facility Description [326 IAC 2-7-5(15)]: Printing Presses (continued)

- (15) One (1) Hantscho web offset lithographic printing press with two (2) units and two (2) webs identified as Press 295 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5P(S). The press may operate in either a heatset or nonheatset mode.
- (16) One (1) Harris web offset lithographic printing press with two (2) units and two (2) webs identified as Press 296 with a maximum line speed of 860 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(S). The press may operate in either a heatset or nonheatset mode.
- (17) One (1) Heidelberg sheetfed offset lithographic press identified as Press 258 with a maximum line speed of 505 feet per minute and a maximum printing width of 40.5 inches including six (6) units and coater, exhausting to one (1) stack SP-5R(S) used as cooling air for electric heaters.
- (18) One (1) In-line Stainer 192 used for edge staining paper using low pressure-high volume spray coating and using dry filters for overspray control and exhausting through stack BS-4X(S).
- (19) One (1) nonheatset, sheet-fed, offset lithographic printing press, identified as Press 250, constructed in 2006, exhausting to stack SP-5U(s), capacity: 13,000 sheets (14.56 million square inches) per hour.

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

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

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-7-10.5(d)(5)(A)]

The following presses shall be limited as follows:

- (a) Press 240, Press 281, Press 245, Press 289, Press 238, Press 239, Press 290, Press 291, Press 293, Press 294, Press 295, and Press 296:

The VOC content delivered to the applicator of each press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

For each press, VOC emitted shall be based on the following equation:

$$\begin{aligned} \text{VOC emissions (tpy)} = & \\ & (\text{ink usage in heatset mode} * \text{VOC content} * 80\% \text{ flash off}) + \\ & (\text{ink usage in nonheatset mode} * \text{VOC content} * 5\% \text{ flash off}) + \\ & (\text{fountain solution usage} * \text{VOC content} * 100\% \text{ flash off}) + \\ & (\text{manual cleaner usage} * \text{VOC content} * 50\% \text{ flash off}) + \\ & (\text{automatic cleaner usage} * \text{VOC content} * 100\% \text{ flash off}) \end{aligned}$$

(b) Press 258:

The VOC content delivered to the applicator of Press 258 shall be limited such that VOC emitted is less than ten (10) tons per twelve (12) consecutive month period.

(c) Press 232 and Press 233:

The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons combined pressroom emissions from Press 232 and Press 233 (combined) per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

For these two presses, total VOC emitted shall be based on the following equation:

$$\begin{aligned} \text{VOC emissions (tpy)} = & \\ & (\text{ink usage} * \text{VOC content} * 80\% \text{ flash off}) + \\ & (\text{fountain solution usage} * \text{VOC content} * 100\% \text{ flash off}) + \\ & (\text{manual cleaner usage} * \text{VOC content} * 50\% \text{ flash off}) \end{aligned}$$

Amendment 107-10512-00052, issued March 15, 1999, allowed usage of isopropyl alcohol at 750 pounds per year as part of the fountain solution and shall remain in effect.

(d) Press 242 and Press 243:

Pursuant to CP 107-4233 issued April 20, 1995, total VOC content delivered to the applicator of Press 242 and Press 243 shall be limited such that VOC emitted is less than a combined 39 tons per year, calculated on a 12 month rolling monthly average. The total amount of VOC delivered to each press individually, including clean-up solvents, shall be limited such that VOC emitted is less than 25 tons per year, per press, calculated on a 12 month rolling monthly average. Therefore, 326 IAC 2-2 and 326 IAC 8-1-6 do not apply.

For each press, VOC emitted shall be based on the following equation:

$$\begin{aligned} \text{VOC emissions (tpy)} = & \\ & (\text{ink usage in heatset mode} * \text{VOC content} * 80\% \text{ flash off}) + \\ & (\text{ink usage in nonheatset mode} * \text{VOC content} * 5\% \text{ flash off}) + \\ & (\text{fountain solution usage} * \text{VOC content} * 100\% \text{ flash off}) + \\ & (\text{manual cleaner usage} * \text{VOC content} * 50\% \text{ flash off}) + \\ & (\text{automatic cleaner usage} * \text{VOC content} * 100\% \text{ flash off}) \end{aligned}$$

(e) Press 260, Press 261, Press 262, Press 273, Press 268 and Press 269:

(1) When operating in heatset mode, Presses 268 and 269 will be controlled by the North Oxidizer, a 7.6 MMBtu per hour thermal oxidizer, and Presses 260, 261, 262 and 273 will be controlled by the South Oxidizer, a 1.7 MMBtu per hour thermal oxidizer. The thermal oxidizers shall be in operation at all times during which any of the printing presses controlled by the oxidizers are operating in heatset mode.

(A) Pursuant to CP 107-2726 issued on February 26, 1993 and CP 107-2917 issued on April 6, 1993, Presses 268 and 269 shall not be operated in heatset mode until such time that the combustion temperature in the thermal oxidizer has attained the minimum temperature determined in testing requirements to destroy at least 90% of captured VOC.

- (B) Presses 260, 261, 262, and 273 shall not be operated in heatset mode until such time that the combustion temperature in the thermal oxidizer has attained the minimum temperature determined in testing requirements to destroy at least 97% of captured VOC.
- (2) When operating any of Presses 260, 261, 262, 273, 268, and 269 in nonheatset mode:
 - (A) The inks used by that press shall not contain greater than 2.5 pounds of VOC per gallon, as applied;
 - (B) The fountain solution used by that press shall not contain greater than 2.0% VOC content by weight, as applied; and
 - (C) The solvents used for blanket and roller washes by that press shall comply with at least one (1) of the following:
 - (i) The solvent shall not have a composite VOC vapor pressure greater than 10 mm Hg at 20°C, or
 - (ii) The solvent shall not contain greater than 2.5 pounds of VOC per gallon, as applied.

D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The VOC content delivered to Stainer 192 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.3.3 Clean-up Solvent VOC Emissions Control

The VOC flash off for clean-up solvent is 100%. As derived from USEPA's Alternative Control Techniques Document: Offset Lithographic Printing (EPA 453/R-94 054, June 1994), the accepted shop towel retention factor for clean-up solvent is 50%. A 50% reduction in flash off shall be used in VOC emissions formulae in D.3.1 as an emission control technique and shall meet the following conditions:

- (a) The clean-up solvent shall have a VOC content of thirty percent (30%) or less, by weight, or a composite VOC vapor pressure less than or equal to ten (10) millimeters of mercury (Hg) at twenty degrees Celsius (20°C); and
- (b) The clean-up solvents shall be kept in tightly covered tanks or containers during transport and storage; and
- (c) The cleaning cloths used with the clean-up solvents shall be placed in tightly closed containers when not in use and while awaiting off-site transport. The cleaning cloths shall be properly cleaned and disposed.

D.3.4 VOC Emissions

Compliance with Condition D.3.1 and D.3.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period and appropriate flash off factors.

D.3.5 Particulate Matter (PM) [326 IAC 6-3]

The PM from Stainer 192 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.7 Particulate Matter (PM)

The dry filters shall be in operation at all times Stainer 192 is in operation, in order to comply with this limit.

D.3.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after issuance of this permit, the Permittee shall conduct performance tests to verify VOC destruction efficiency as per Condition D.3.1 for each thermal oxidizer using methods as approved by the Commissioner. These tests shall be repeated at least once every two and one-half (2 1/2) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.2 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 manufacturer. 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.3.10 Thermal Oxidizers

- (a) The North Oxidizer shall operate at all times that either of the Presses 268 or 269 are operating in heatset mode.
- (b) The South Oxidizer, identified as RTO-1, shall operate at all times that any of Presses 260, 261, 262, or 273 are operating in heatset mode.
- (c) When operating the North Oxidizer, the thermal oxidizer shall maintain a minimum operating temperature of:
 - (1) 1350°F, or
 - (2) the temperature and fan amperage or duct velocity determined at the stack tests that achieves a minimum 90% destruction efficiency of the VOC.
- (d) When operating the South Oxidizer, the thermal oxidizer shall maintain a minimum operating temperature of:
 - (1) 1350°F, or
 - (2) the temperature and fan amperage or duct velocity determined at the stack tests that achieves a minimum 97% destruction efficiency of the VOC.

D.3.11 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on each thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate each thermal oxidizer at or above the 3-hour average temperature of 1350°F.
- (b) The Permittee shall determine, for each thermal oxidizer, the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with the control efficiency requirement in Condition D.3.1(e)(1), as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate each thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

D.3.12 Parametric Monitoring

- (a) The Permittee shall determine, for each thermal oxidizer, the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the control efficiency requirement in Condition D.3.1(e)(1), as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

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

D.3.13 Particulate Matter Monitoring

- (a) Pursuant to CP 107-2853 daily inspection from the in-line Stainer Press 192 shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. During periods of inclement weather, these inspections shall be performed as weather permits. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.3.14 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1, D.3.2 and D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1, D.3.2 and D.3.3:
 - (1) The amount and VOC content of each ink, fountain solution, coating material and solvent used. Records shall include purchase orders, invoices, material safety data sheets (MSDS) or other documentation necessary to verify the type and

amount used. Ink usage records shall indicate whether the ink was used in heatset or nonheatset mode. Solvent usage records shall differentiate between those used in coatings and ink and those used as cleanup solvents;

- (2) The volume weighted VOC content of the nonheatset inks used on Presses 260, 261, 262, 273, 268, and 269 for each month;
 - (3) The total VOC usage for each month;
 - (4) The weight of VOCs emitted for each compliance period; and
 - (5) The VOC content of the used shop towels.
- (b) To document compliance with Condition D.3.12, the Permittee shall maintain a log of weekly overspray observations.
 - (c) To document the compliance with Condition D.3.10 and D.3.11, the continuous temperature records for the thermal oxidizers and the temperature used to demonstrate compliance during the most recent compliance stack test and weekly records of the duct pressure or fan amperage.
 - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.15 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 and D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: R.R. Donnelley & Sons Company
Source Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
Mailing Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
Part 70 Permit No.: T107-5963-00052

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
AIR COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: R.R. Donnelley & Sons Company
Source Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
Mailing Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
Part 70 Permit No.: T107-5963-00052

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) - 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**

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

Source Name: R.R. Donnelley & Sons Company
Source Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
Mailing Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
Part 70 Permit No.: T107-5963-00052

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

Report period
Beginning: _____
Ending: _____

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

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: _____

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is not required for this report.

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

Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company
 Source Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
 Mailing Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
 Part 70 Permit No.: T107-5963-00052
 Facilities: (per press) Press 240, Press 281, Press 245, Press 289, Press 290, Press 291, Press 293, Press 294, Press 295, Press 296, Press 258, Press 238, Press 239, and Press 232 and Press 233 (combined)
 Parameter: VOC
 Limit: The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

VOC emissions (tpy) =
 (ink usage in heatset mode * VOC content * 80% flash off) +
 (ink usage in nonheatset mode * VOC content * 5% flash off) +
 (fountain solution usage * VOC content * 100% flash off) +
 (manual cleaner usage * VOC content * 50% flash off) +
 (automatic cleaner usage * VOC content * 100% flash off)

Press: _____ YEAR: _____

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on:

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

A certification is required for this report.

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

Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company
 Source Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
 Mailing Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
 Part 70 Permit No.: T107-5963-00052
 Facility: Press 242 and Press 243
 Parameter: VOC
 Limit: VOC input usage shall be not exceed a combined 39 tons per year, based on 80% VOC flash-off during web heatset ink usage and 5% VOC flash-off during web nonheatset ink usage, calculated on a 12 month rolling monthly average. The total amount of VOC delivered to each press individually, including clean-up solvents, shall not exceed 25 tons per year, per press, based on 80% VOC flash-off during web heatset ink usage and 5% VOC flash-off during web nonheatset ink usage, calculated on a 12 month rolling monthly average. (Assuming 100% VOC flash off for fountain solution and 50% VOC flash off for cleaner usage)

YEAR: _____

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

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

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: R.R. Donnelley & Sons Company
Source Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
Mailing Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
Part 70 Permit No.: T107-5963-00052

Months: _____ to _____ Year: _____

Page 1 of 2

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company
Source Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
Mailing Address: 1009 Sloan Street, Crawfordsville, IN 47933-2743
Part 70 Permit No.: T107-5963-00052
Facility: In-line Stainer 192
Parameter: VOC
Limit: VOC input usage shall be less than twenty-five (25) tons per twelve (12) consecutive month period.

YEAR: _____

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a
Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	R. R. Donnelley & Sons Company
Source Location:	1009 Sloan Street, Crawfordsville, IN 47933-2743
County:	Montgomery
SIC Code:	2732
Operation Permit No.:	107-5963-00052
Operation Permit Issuance Date:	June 21, 2002
Revision No.:	107-23347-00052
Permit Reviewer:	Allen R. Davidson

On Friday, December 22, 2006, the Office of Air Quality (OAQ) had a notice published in the *Crawfordsville Journal Review* stating that R. R. Donnelley & Sons Company had applied for a Significant Permit Modification to a Part 70 Operating Permit issued on June 21, 2002. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow R. R. Donnelley & Sons Company to re-evaluate the volatile organic compounds (VOC) best available control technology (BACT) determination for six (6) existing printing presses (Presses 260, 261, 262, 268, 269 and 273) when operating as nonheatset presses. The notice also stated that OAQ proposed to issue a permit for this change and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed. On Thursday, March 22, 2007, OAQ held a public meeting regarding this proposed modification at the Crawfordsville District Public Library, 205 South Washington Street, Crawfordsville, IN 47933-2444.

Danielle Tucker, a citizen of Crawfordsville, submitted the following comment on the proposed permit modification.

Comment 1:

The commenter stated that it was unclear whether the air quality observations and proposed estimates examine any cumulative effect of pollutants from a number of stacks emitting the new rates at the same time. All of the R.R. Donnelley & Sons emission sites are located in or very near to residential areas, and the release of emissions from more than one location at the same time, particularly when combined with a temperature inversion, may create a public health concern.

Response 1:

OAQ does take into account the cumulative effects from multiple points of air pollution emissions, both at the "emission source" level (plant level) and at the county level. The source emissions are discussed in the "Permit Level Determination - Part 70" and "Permit Level Determination - PSD" sections of the Technical Support Document (TSD). The "County Attainment Status" section of the TSD discusses cumulative effects of emissions at the county level.

The federal Clean Air Act requires the United States Environmental Protection Agency (U.S. EPA) to set National Ambient Air Quality Standards (NAAQS) for six criteria pollutants. These criteria pollutants are carbon monoxide (CO), lead, sulfur dioxide (SO₂), particulate matter to a diameter of 2.5 microns (PM_{2.5}), nitrogen oxides (NO_x) and ground level ozone. Ground level ozone is created by the interaction of Volatile Organic Compounds (VOCs) with NO_x during warm, sunny days when there is little wind.

The U.S. EPA sets these standards at levels that protect human health, which is why the NAAQS are also often referred to as the federal health standards for outdoor air. The NAAQS limit for all criteria pollutants is set to protect human health, including the health of sensitive persons, such as asthmatics, children, and the elderly. More information about each of these pollutants is available at <http://www.epa.gov/air/airpollutants.html> on U.S. EPA's website. The complete table of the NAAQS for all six criteria pollutants can be found at the <http://www.epa.gov/air/criteria.html> website. EPA's website <http://www.epa.gov/air/urbanair/6poll.html> provides more detailed information about the health effects of these six common air pollutants and why they are regulated.

The federal Clean Air Act requires the U.S. EPA to determine whether the ambient air in any area of the United States fails to meet any of the NAAQS. Any area that fails to meet one or more of the NAAQS will be designated as in "nonattainment" for that pollutant. Large air pollution sources in a nonattainment area are subject to additional regulations and U.S. EPA may require that additional steps be taken that will result in the area meeting the NAAQS.

Montgomery County has been classified by the U.S. EPA as attainment for all the NAAQS. This means that for each pollutant that has a federally-mandated National Ambient Air Quality Standard, Montgomery County meets each of those standards. IDEM, OAQ has no indication that the emissions from the R.R. Donnelly plant, either alone or in combination with other sources of air pollution within the county, will cause or contribute to a violation of any NAAQS under any weather condition. When demonstrating that an area is in attainment, IDEM, OAQ uses all the data about all the air pollution emitted in the area and enters it into a computer model. This computer model uses weather data recorded in the same area and generates pollution levels using the weather conditions that would lead to the highest pollution concentrations.

IDEM, OAQ conducts ambient air monitoring for ozone, coarse particulate matter, fine particulate matter, sulfur dioxide, nitrogen oxides, carbon monoxide, lead and air toxics at locations around Indiana. Information and maps of these monitoring sites is located at <http://www.in.gov/idem/programs/air/amb/index.html> on the internet.

Information about current and expected air pollution levels is available on IDEM's SmogWatch site at <http://www.in.gov/apps/idem/smog/> on the internet. The site is designed to provide an easy-to-read forecast of air quality. The site also provides information about ground-level ozone and particulate matter forecasts.

Ambient monitoring of toxic air pollutants in Indiana is conducted as part of the ToxWatch Program. IDEM, OAQ currently monitors for air toxics at 10 locations across the state. The closest air toxics monitor to Montgomery County is located in Marion County. The data from all of the air toxics monitors is available on IDEM, OAQ's ToxWatch site at <http://www.in.gov/idem/programs/air/toxwatch/> on the internet. Information on the health effects of hazardous air pollutants can be found on the U.S. EPA's website at <http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/ChemicalsInYourCommunity.htm> on the internet. Information pertaining to emissions of hazardous air pollutants in Montgomery County can be found at <http://www.epa.gov/tri> on the internet.

To ensure that the addition of new emission sources and modification of existing sources do not cause Montgomery County's air quality to degrade into nonattainment with the NAAQS, emissions increases are reviewed pursuant to the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2.

Prevention of Significant Deterioration (PSD) is a construction air pollution permitting program designed to ensure that air quality does not degrade beyond the NAAQS levels or beyond specified incremental amounts above a prescribed baseline level. Best Available Control Technology (BACT) is the emission control level required for sources subject to PSD. BACT is an emissions limitation (including a visible emissions standard) based on the maximum degree of reduction for each pollutant subject to regulation which would be emitted from any proposed major stationary source or major modification which, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, that IDEM, OAQ determines is achievable. IDEM, OAQ can only apply PSD requirements to sources that are making a significant increase in their potential to emit air pollution. The potential to emit

for R.R. Donnelley & Sons Company is based on the worst-case operating scenario, which is heatset mode.

Significant Permit Modification 107-23347-00052 does not involve any new equipment or processes. For this application, the review concentrated on six (6) existing units. Since this permit modification only modifies permit conditions as they relate to the non-heatset mode and the changes do not cause the non-heatset mode to become the worst-case operating scenario, the emission source's potential to emit remains unchanged.

There are no changes to the draft permit due to this comment.

Jessica Ortiz, of R. R. Donnelley & Sons Company, submitted the following comments on the proposed permit modification. The summary of the comments and the corresponding responses are indicated below. **Bolded** language indicates language that has been added, and language with a ~~line through it~~ indicates that language has been deleted. The Table of Contents has been modified to reflect these changes.

Comment 1:

The commenter requested an editorial revision to the description of Press 260 to make the description consistent with those of other presses.

Response 1:

The facility description for Press 260 was edited to make it consistent with the descriptions of Presses 261, 262 and 273, as follows:

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

This book printing and binding operation consists of the following emission units and pollution control devices:

North Plant:

[Items (1) through (16) remain unchanged.]

South Plant:

[Items (1) through (8) remain unchanged.]

- (9) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, ~~and~~. **The press may operate in either a heatset or nonheatset mode**, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5I(S) in nonheatset mode. ~~The press may operate in either a heatset or nonheatset mode.~~

[Items (10) through (19) remain unchanged.]

SECTION D.3

FACILITY OPERATION CONDITION

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

North **Plant**:

[Items (1) through (16) remain unchanged.]

South **Plant**:

[Items (1) through (8) remain unchanged.]

- (9) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, ~~and~~. **The press may operate in either a heatset or nonheatset mode**, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5I(S) in nonheatset mode. ~~The press may operate in either a heatset or nonheatset mode.~~

[Items (10) through (19) remain unchanged.]

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

Comment 2:

The commenter requested a statement be added into Condition D.3.1(a)(1) to explain the 25 ton per year VOC emissions limits for presses 240 and 281, as follows:

- (1) *The requirements from Registered Construction and Operation Status letter issued June 19, 1988 (Press 240), and Registered Construction and Operation Status letter issued October 23, 1991 (Press 281), state that "Any change or modification which may increase the volatile organic compound potential emissions to 25 tons per year or more from the equipment covered in this registration must be approved by OAQ before such change may occur." The previous operating permits did not anticipate that the potential emissions would be greater than 25 tons per year and therefore did not address the requirements of 326 IAC 8-1-6. The source limited the running time in order to keep VOC emissions below 25 tons per year. **This limit is replaced by a limitation on potential to emit of 25 tons per year. In order to maintain consistency in permit language, reporting and monitoring, the intent is to limit the VOC, rather than hours.***

Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.

Response 2:

Press 240 and Press 281 were originally approved by registrations issued in 1988 and 1991, respectively. The descriptive information regarding these registrations is no longer necessary. Item (a)(1) of Condition D.3.1 will be deleted in its entirety instead of adding language to clarify it. OAQ will also delete items (a)(2), (a)(3), the former item (b)(1) and the former item (d)(3) for the same reason that the descriptive information is no longer necessary. These deletions are shown below:

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-7-10.5(d)(5)(A)]

The following presses shall be limited as follows:

- (a) Press 240, Press 281, Press 245, Press 289, Press 238, Press 239, Press 290, Press 291, Press 293, Press 294, Press 295, and Press 296:

...

- (1) ~~The requirements from Registered Construction and Operation Status letter issued June 19, 1988 (Press 240), and Registered Construction and Operation Status letter issued October 23, 1991 (Press 281), state that "Any change or modification which may increase the volatile organic compound potential emissions to 25 tons per year or more from the equipment covered in this registration must be approved by OAQ before such change may occur." The previous operating permits did not anticipate that the potential emissions would be greater than 25 tons per year and therefore did not address the requirements of 326 IAC 8-1-6. The source limited the running time in order to keep VOC emissions below 25 tons per year.~~

~~Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.~~

- (2) ~~The requirements from PC (54) 1746 issued on May 3, 1989 (Press 245) limiting hours of operation, limiting by press description, maintenance of a log of information and quarterly reporting of hours used ; PC (54) 1740 issued on April 5, 1989 (Press 293) limiting hours of operation, limiting by press description; Registered Construction (107) 2045 issued October 17, 1991 (Press 294) limiting by press description and pound per hour of ink and solution usage; Registered Construction and Operation Status CP 107-2947 issued April 23, 1993 (Press 296) limiting by press description; and Registered Construction and Operation Status CP 107-3433 issued January 21, 1994 (Press 296) limiting by press description are replaced with the new limits.~~

~~Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.~~

- (3) ~~The requirements from PC (54) 1257 issued July 11, 1978 (Press 287 and Press 288), PC (34) 1285 issued on September 6, 1978 (Press 286) and PC (54) 1398 issued on June 18, 1979 limiting hydrocarbons (Press 270) and requiring the use of non-photochemically reactive hydrocarbons, are replaced because these presses were constructed prior to January 1, 1980 and are not subject to Article 8 rules. Also included are presses Press 285, Press 272, and Press 276 which were also built prior to January 1, 1980.~~

~~Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.~~

...

- (b) (c) Press 232 and Press 233:

...

- (1) ~~The requirements from Registered Construction and Operation Status (107) 2042 issued on July 11, 1991 (Press 232 and Press 233) to use an ultraviolet light curing system to limit VOC releases from the ink, the requirements to use a less volatile printing aid than isopropyl alcohol, and the requirements limiting fountain solution to 2.5 percent VOC per gallon are being replaced with new language~~

~~and limits. In order to maintain consistency in permit language, reporting and monitoring, the intent is to limit the VOC, rather than hours, impressions, VOC content of solutions or press descriptions.~~

~~Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.~~

- (2) — Amendment 107-10512-00052 issued March 15, 1999, allowed usage of isopropyl alcohol at 750 pounds per year as part of the fountain solution and shall remain in effect.

...

- (d) (e) Press 260, Press 261, Press 262, Press 273, Press 268 and Press 269:

...

- (3) — The requirements from:

(A) — CP 107-2726 issued on February 26, 1993,

(B) — CP 107-2917 issued on April 6, 1993, conditions #5, #7, #8, and #9,

(C) — CP 107-2478 issued on June 17, 1992, conditions #4, and #5,

(D) — Registered Construction and Operation Status letter issued on November 8, 1989,

(E) — Registered Construction and Operation Status letter issued on February 2, 1987, and

(F) — PC (54) 1853, issued on October 20, 1990,

~~were removed and have been replaced with new requirements, in order to regulate all thermal oxidizers within the entire facility on the same parameters, monitoring and reporting schedule to maintain compliance with 326 IAC 8-1-6 (BACT).~~

Comment 3:

The commenter stated that Press 258 is discussed in Condition D.3.1(a)(4) but is not listed in the header of Condition D.3.1(a).

Response 3:

OAQ will change Condition D.3.1(a)(4) to give Press 258 its own header. This press is not limited in the same manner as the other presses in Condition D.3.1(a). Press 258 has a potential to emit VOC of less than 10 tons per year based on 8760 hours of use per year, whereas the other presses in Condition D.3.1(a) each have a federally enforceable limit of 25 tons of VOC per year. Item (a)(4) will be listed as item (b), and the former items (b), (c) and (d) will be re-lettered. These changes are shown below:

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-7-10.5(d)(5)(A)]

The following presses shall be limited as follows:

- (a) Press 240, Press 281, Press 245, Press 289, Press 238, Press 239, Press 290, Press 291, Press 293, Press 294, Press 295, and Press 296:

...

(4) _____

(b) Press 258:

Exempt Construction and Operation Status CP 107-4781 issued September 28, 1995 (Press 258) is replaced by a new limitation on potential to emit of 10 tons per year. Any change or modification which may increase the volatile organic compound potential emissions to more than 10 tons per year must be reported to IDEM, OAQ. **The VOC content delivered to the applicator of Press 258 shall be limited such that VOC emitted is less than ten (10) tons per twelve (12) consecutive month period.**

~~(b)~~ **(c)** Press 232 and Press 233:

...

~~(c)~~ **(d)** Press 242 and Press 243:

...

~~(d)~~ **(e)** Press 260, Press 261, Press 262, Press 273, Press 268 and Press 269:

...

Comment 4:

The commenter stated that the discussion of the VOC input and emissions from Presses 242 and 243 in Condition D.3.1(c) should be revised to more accurately reflect the usage limitation of CP 107-4233 and to address VOC emissions calculations from these presses.

Response 4:

The former Condition D.3.1(c), which addressed Press 242 and Press 243, has been revised to read similarly to Condition D.3.1(a) and the former Condition D.3.1(b). These changes are shown below:

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-7-10.5(d)(5)(A)]

The following presses shall be limited as follows:

...

~~(c)~~ **(d)** Press 242 and Press 243:

Pursuant to CP 107-4233 issued April 20, 1995, total VOC input usage to content delivered to the applicator of Press 242 and Press 243 shall ~~not exceed~~ **be limited such that VOC emitted is less than** a combined 39 tons per year, ~~based on 80% VOC flash-off during web heatset ink usage and 5% VOC flash-off during web nonheatset ink usage,~~ calculated on a 12 month rolling monthly average. The total amount of VOC delivered to each press individually, including clean-up solvents, shall ~~not exceed~~ **be limited such that VOC emitted is less than** 25 tons per year, per press, ~~based on 80% VOC flash-off during web heatset ink usage and 5% VOC flash-off during web nonheatset ink usage,~~ calculated on a 12 month rolling monthly average. **Therefore, 326 IAC 2-2 and 326 IAC 8-1-6 do not apply.**

For each press, VOC emitted shall be based on the following equation:

VOC emissions (tpy) =

**(ink usage in heatset mode * VOC content * 80% flash off) +
(ink usage in nonheatset mode * VOC content * 5% flash off) +
(fountain solution usage * VOC content * 100% flash off) +
(manual cleaner usage * VOC content * 50% flash off) +
(automatic cleaner usage * VOC content * 100% flash off)**

...

Comment 5:

The commenter stated that R. R. Donnelley & Sons Company is willing to accept the VOC content limitation for fountain solution and the vapor pressure and VOC content limitations for cleaning solvents proposed as BACT for this process. R. R. Donnelley & Sons Company believes these are reasonable limitations that will reduce VOC emissions without unnecessarily limiting the printing operations. R. R. Donnelley & Sons Company does, however, believe the proposed ink VOC content limitation is inappropriate for this printing process and may present severe production limitations without resulting in a significant reduction in VOC emissions.

IDEM cites the December 1996 Pacific Southwest Container BACT determination as the basis for setting a VOC content limit of 5% for the nonheatset inks in this permit without consideration of the process used by Pacific Southwest Container for which this VOC content was established. R. R. Donnelley & Sons Company stated that the 5% limitation on inks at Pacific Southwest Container is for lower quality, low resolution packaging printing, where print quality, color, and resolution is of limited importance. As stated in the BACT determination, a VOC content limit of 30% for ink was provided for "high end graphics", along with a higher VOC content for fountain solution.

R. R. Donnelley & Sons Company believes that the high end graphics performed at Pacific Southwest Container is more comparable to the publication printing that is to be conducted on the subject presses at the R.R. Donnelley facility in Crawfordsville, where full color, high resolution, high quality printed products are required to meet the customer needs. Accordingly, R. R. Donnelley & Sons Company requested that the VOC limit for inks be set at 30% as part of IDEM's BACT determination.

R. R. Donnelley & Sons Company also commented that the inks currently used at this facility are very low VOC content materials, however, future production needs and/or customer specifications may require the use of higher VOC materials. R. R. Donnelley & Sons Company believes the proposed 5% VOC content limitation is too restrictive to allow for the operational flexibility required for these presses and is inconsistent with previous BACT determinations for similar and comparable operations.

Response 5:

OAQ has reevaluated the BACT analysis, which appeared as the former Condition D.3.1(d), and concluded that the 5% VOC content limit for inks, by weight, imposed on a press at a Pacific Southwest Container facility in California should be excluded from consideration in the BACT analysis due to inherent dissimilarities in the quality required between the two processes.

OAQ also discovered an error on Page 8 of the TSD, which states that a press at a Sierra Office Systems facility in California has a limit of 8% VOC content for inks, by weight. This VOC limit is for fountain solution, not for inks. (The table on Page 9 of the TSD states correctly that the 8% VOC limit is for fountain solution.) This limit on fountain solution is less stringent than the press at Los Angeles Times Communications, LLC, and also less stringent than the BACT that R. R. Donnelley & Sons Company is accepting for fountain solution. Correcting the error does not affect the BACT determination for fountain solution, but it does remove Sierra Office Systems from consideration in the BACT analysis for inks.

The most stringent limit for inks is on a press at a Williams Printing Company facility in Georgia, which has a VOC content limit for inks of not greater than 2.5 pounds of VOC per gallon, as applied. It equates to a limit of 29.4% VOC for inks, as applied, which is comparable with the most stringent BACT found for nonheatset offset lithographic printing presses in the USEPA BACT/RAC/EAER Clearinghouse.

Based on this re-evaluation, a revised BACT determination has been included as Appendix A to this Addendum. See Appendix A of this Addendum for details regarding the revised BACT analysis. The changes to Condition D.3.1(e) are shown below:

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-7-10.5(d)(5)(A)]

The following presses shall be limited as follows:

...

~~(d)~~ (e) Press 260, Press 261, Press 262, Press 273, Press 268 and Press 269:

...

(2) When operating any of Presses 260, 261, 262, 273, 268, and 269 in nonheatset mode:

(A) The inks used by that press shall not contain greater than ~~5.0% VOC content by weight~~ **2.5 pounds of VOC per gallon**, as applied;

(B) The fountain solution used by that press shall not contain greater than 2.0% VOC content by weight, as applied; and

(C) The solvents used for blanket and roller washes by that press shall comply with at least one (1) of the following:

(i) The solvent shall not have a **composite VOC** vapor pressure greater than 10 mm Hg at 20^o ~~degrees~~ C, or

(ii) The solvent shall not contain greater than 2.5 pounds of VOC per gallon, as applied.

...

Comment 6:

The commenter requested that references to the term "afterburner" in the TSD and draft permit be replaced by the more appropriate term "oxidizer" for consistency throughout the documents.

Response 6:

All instances of the term "afterburner" in Condition D.3.1(e)(1) have been changed to read "oxidizer" as follows:

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-7-10.5(d)(5)(A)]

The following presses shall be limited as follows:

...

~~(d)~~ (e) Press 260, Press 261, Press 262, Press 273, Press 268 and Press 269:

(1) When operating in heatset mode, Presses 268 and 269 will be controlled by the North Oxidizer, a 7.6 MMBtu per hour thermal oxidizer, and Presses 260, 261, 262 and 273 will be controlled by the South Oxidizer, a 1.7 MMBtu per hour thermal oxidizer. The thermal oxidizers shall be in operation at all times during which any of the printing presses controlled by the oxidizers are operating in heatset mode.

(A) Pursuant to CP 107-2726 issued on February 26, 1993 and CP 107-2917 issued on April 6, 1993, Presses 268 and 269 shall not be operated in heatset mode until such time that the combustion temperature in the thermal ~~afterburner~~ **oxidizer** has attained the minimum temperature determined in testing requirements to destroy at least 90% of captured VOC.

- (B) Presses 260, 261, 262, and 273 shall not be operated in heatset mode until such time that the combustion temperature in the thermal ~~afterburner~~ **oxidizer** has attained the minimum temperature determined in testing requirements to destroy at least 97% of captured VOC.

...

Comment 7:

The commenter stated that in the formulae for the calculation of VOC emissions, the term "volatile content" should be revised to read "VOC content". Although the two terms are equivalent when a material is 100% VOC, for other materials where there are non-VOC volatiles, the two terms may differ significantly. For example, fountain solutions may be essentially 100% volatile but only 2% VOC. If VOC emissions were calculated based on volatiles (in this case water and VOC), the calculated emissions would be roughly 50 times the true value. Use of VOC content will remove any confusion for emissions calculations.

Response 7:

The weight and the volume of all volatiles that are not classifiable as "volatile organic compounds" under 326 IAC 1-2-90, such as water, should be excluded from the VOC emission calculations. Therefore, all instances of the term "volatile content" in the permit have been changed to read "VOC content".

The following changes were made to Condition D.3.1 of the permit:

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-7-10.5(d)(5)(A)]

The following presses shall be limited as follows:

- (a) Press 240, Press 281, Press 245, Press 289, Press 238, Press 239, Press 290, Press 291, Press 293, Press 294, Press 295, and Press 296:

The VOC content delivered to the applicator of each press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

For each press, VOC emitted shall be based on the following equation:

$$\begin{aligned} \text{VOC emissions (tpy)} = & \\ & (\text{ink usage in heatset mode} * \text{volatile VOC content} * 80\% \text{ flash off}) + \\ & (\text{ink usage in nonheatset mode} * \text{volatile VOC content} * 5\% \text{ flash off}) + \\ & (\text{fountain solution usage} * \text{volatile VOC content} * 100\% \text{ flash off}) + \\ & (\text{manual cleaner usage} * \text{volatile VOC content} * 50\% \text{ flash off}) + \\ & (\text{automatic cleaner usage} * \text{volatile VOC content} * 100\% \text{ flash off}) \end{aligned}$$

...

- (b) **Press 258:**

...

~~(b)~~ (c) Press 232 and Press 233:

The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons combined pressroom emissions from Press 232 and Press 233 (combined) per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

For these two presses, total VOC emitted shall be based on the following equation:

$$\begin{aligned} \text{VOC emissions (tpy)} = & \\ & (\text{ink usage} * \text{volatile VOC content} * 80\% \text{ flash off}) + \\ & (\text{fountain solution usage} * \text{volatile VOC content} * 100\% \text{ flash off}) + \\ & (\text{manual cleaner usage} * \text{volatile VOC content} * 50\% \text{ flash off}) \\ & \dots \end{aligned}$$

~~(c)~~ (d) Press 242 and Press 243:

...

~~(d)~~ (e) Press 260, Press 261, Press 262, Press 273, Press 268 and Press 269:

...

Comment 8:

The commenter stated that although R. R. Donnelley & Sons Company agrees with ten (10) millimeters of mercury (Hg) at twenty degrees Celsius (20°C) as a reasonable vapor press limitation, it is important to clarify that this is a VOC composite vapor pressure. Since some cleaning materials contain water (vapor pressure of 17.54 mm Hg at 20°C) or exempt, non-VOC components such as acetone (vapor pressure of 180 mm Hg at 20°C), a limitation on the total vapor pressure is inappropriate, since evaporation of these non-VOC components is not of concern. Instead, the limits on vapor pressure have been based on the composite VOC vapor pressure, which is the true indicator of VOC evaporation. U.S. EPA, for example, uses the term "composite VOC vapor pressure" in its recently issued Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing (EPA-453/R-06-002, September 2006) as the basis for establishing cleaning solvent vapor pressure.

Response 8:

All instances of the terms "vapor pressure" or "composite vapor pressure" in the permit have been changed to read "composite VOC vapor pressure". The changes to Condition D.3.1 were shown earlier in this addendum. The changes to Condition D.3.3 are shown below:

D.3.3 Clean-up Solvent VOC Emissions Control

The VOC flash off for clean-up solvent is 100%. As derived from USEPA's Alternative Control Techniques Document: Offset Lithographic Printing (EPA 453/R-94 054, June 1994), the accepted shop towel retention factor for clean-up solvent is 50%. A 50% reduction in flash off shall be used in VOC emissions formulae in D.3.1 as an emission control technique and shall meet the following conditions:

- (a) The clean-up solvent shall have a VOC content of thirty percent (30%) or less, by weight, or a composite **VOC** vapor pressure less than or equal to ten (10) millimeters of mercury (Hg) at twenty degrees Celsius (20°C); and
- (b) The clean-up solvents shall be kept in tightly covered tanks or containers during transport and storage; and

- (c) The cleaning cloths used with the clean-up solvents shall be placed in tightly closed containers when not in use and while awaiting off-site transport. The cleaning cloths shall be properly cleaned and disposed.

Comment 9:

The commenter requested that Condition D.3.8 of the draft permit be modified to more correctly reflect the required destruction efficiencies of the two oxidizers at this facility, as follows:

D.3.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

*Compliance stack tests shall be performed on the thermal oxidizers to determine the operating temperature and fan amperage or duct velocity at ~~90% minimum destruction of VOC~~ **the destruction efficiency of VOC required by Condition D.3.1** within 180 days of issuance of this permit. These tests shall be repeated once every two and one-half (2 1/2) years. These tests shall be performed using methods approved by the OAQ. The OAQ shall be notified of the actual test date at least two weeks prior to the date, a test protocol shall be submitted to the OAQ, Compliance Data Section, 35 days in advance of the test, and all test reports must be received by the OAQ within 45 days of the completion of the testing.*

Response 9:

The two oxidizers have a different destruction efficiency requirement for each oxidizer, however, Condition D.3.8 only addresses the destruction efficiency requirement for the North Oxidizer. OAQ will revise the condition to refer to Condition D.3.1 in the permit, where the requirements for each oxidizer can be found, instead of attempting to reiterate the requirements specifically. In addition, OAQ will revise Condition D.3.8 to clarify the testing requirements for the two oxidizers, as follows:

D.3.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~Compliance stack tests shall be performed on the thermal oxidizers to determine the operating temperature and fan amperage or duct velocity at 90% minimum destruction of VOC within 180 days of issuance of this permit. These tests shall be repeated once every two and one-half (2 1/2) years. These tests shall be performed using methods approved by the OAQ. The OAQ shall be notified of the actual test date at least two weeks prior to the date, a test protocol shall be submitted to the OAQ, Compliance Data Section, 35 days in advance of the test, and all test reports must be received by the OAQ within 45 days of the completion of the testing.~~

Within one hundred and eighty (180) days after issuance of this permit, the Permittee shall conduct performance tests to verify VOC destruction efficiency as per Condition D.3.1 for each thermal oxidizer using methods as approved by the Commissioner. These tests shall be repeated at least once every two and one-half (2 1/2) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Comment 10:

The commenter suggested clarification for the recordkeeping requirements in Condition D.3.13 consistent with the BACT requirements, as follows:

D.3.13 Record Keeping Requirements

- (a) *To document compliance with Conditions D.3.1, D.3.2 and D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1, D.3.2 and D.3.3:*

- (1) *The amount and VOC content of each ink, fountain solution, coating material and solvent used. Records shall include purchase orders, invoices, material safety data sheets (MSDS) ~~and~~ or other documentation necessary to verify the type and amount used. Ink usage records shall indicate whether the ink was used in heatset or nonheatset mode. Solvent usage records shall differentiate between those ~~added to~~ **used in** coatings and ink and those used as cleanup solvents;*
 - (2) *The volume weighted VOC content of the **nonheatset inks** ~~coatings~~ used on **Presses 260, 261, 262, 273, 268, and 269** for each month;*
 - (3) *The total VOC usage for each month;*
 - (4) *The weight of VOCs emitted for each compliance period; **and***
 - (5) *The VOC content of the used shop towels.*
- (b) *To document compliance with Condition D.3.12, the Permittee shall maintain a log of weekly overspray observations.*
 - (c) *To document the compliance with Condition D.3.10 and D.3.11, the continuous temperature records for the thermal oxidizers and the temperature used to demonstrate compliance during the most recent compliance stack test and weekly records of the duct pressure or fan amperage.*
 - (d) *All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.*

Response 10:

OAQ agrees with the recommended change. The former Condition D.3.13 has been amended to read as follows:

D.3.13 D.3.14 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1, D.3.2 and D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1, D.3.2 and D.3.3:
 - (1) The amount and VOC content of each ink, fountain solution, coating material and solvent used. Records shall include purchase orders, invoices, material safety data sheets (MSDS) ~~and~~ or other documentation necessary to verify the type and amount used. Ink usage records shall indicate whether the ink was used in heatset or nonheatset mode. Solvent usage records shall differentiate between those ~~added to~~ **used in** coatings and ink and those used as cleanup solvents;
 - (2) The volume weighted VOC content of the **nonheatset inks** ~~coatings~~ used on **Presses 260, 261, 262, 273, 268, and 269** for each month;
 - (3) The total VOC usage for each month;
 - (4) The weight of VOCs emitted for each compliance period; **and**
 - (5) The VOC content of the used shop towels.
- (b) To document compliance with Condition D.3.12, the Permittee shall maintain a log of weekly overspray observations.

- (c) To document the compliance with Condition D.3.10 and D.3.11, the continuous temperature records for the thermal oxidizers and the temperature used to demonstrate compliance during the most recent compliance stack test and weekly records of the duct pressure or fan amperage.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 11:

The commenter requested a correction to the citation of 326 IAC 8-5-5 in the TSD. Although the heading for this citation is correct, the descriptive paragraph incorrectly cites 326 IAC 8-2-5 (Paper Coating Operations).

Revisions should be made to the TSD to reflect the proposed higher VOC ink limitation, correct the flash-off factor for inks, and to update the conversions for ink VOC content.

Response 11:

OAQ does not change the Technical Support Document directly; it will be preserved as a record of the public notice document. Instead, the changes are acknowledged in this addendum, which supplements the original Technical Support Document.

The term "326 IAC 8-2-5 (Paper Coating Operations)" on Page 7 of the Technical Support Document should read "326 IAC 8-5-5 (Graphic Arts Operations)". Furthermore, all instances of the term "volatile content" Technical Support Document should read "VOC content", all instances of the term "afterburner" in the Technical Support Document should read "oxidizer" and all instances of the terms "vapor pressure" or "composite vapor pressure" in the Technical Support Document should read "composite VOC vapor pressure".

Additional Changes

Additional Change #1:

Condition A.1 of the permit is hereby amended as follows, to remove the listing of the responsible official:

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

The Permittee owns and operates a book printing and binding operation.

Responsible Official:	Gary Calleo, Vice President and Division Director
Source Address:	1009 Sloan Street, Crawfordsville, IN 47933-2743
Mailing Address:	1009 Sloan Street, Crawfordsville, IN 47933-2743
Phone Number:	(765) 364 -1300
SIC Code:	2732
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD

Additional Change #2:

OAQ also added mail codes to all agency addresses listed in the permit. This affects Conditions B.9, B.10, B.11, B.15, B.18, B.20, B.23, C.7, C.8, C.10, C.13, C.17, C.19 and the Emergency Occurrence Report Form as follows:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, IN 46204-2251

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

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

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

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

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

Additional Change #3:

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] **[326 IAC 2-3]**

-
- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- ~~(c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee)), may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr)), the Permittee shall comply with the following:~~

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

Additional Change #4:

Condition D.2.4(e) contains a reference to the Compliance Response Plan. However, the requirement to develop and maintain a Compliance Response Plan was removed from the draft permit. The obsolete reference to the Compliance Response Plan will be removed from the permit and replaced by the most recent version of permit language regarding the response to excursions or exceedances, as follows:

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhausts for stacks identified as SBP-5H(N), SBP-5I(N), SBP-5J(N), SBP-5K(N), and SBP-5E(S) for Paper Trim Cyclones #1(N), #2(N), #3(N), #4(N), #1(S), #2(S), #3(S) and #4(S) shall be performed during normal daylight operations ~~when exhausting to the atmosphere~~. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

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

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain ~~records of a~~ daily **record of** visible emission notations of the stack exhausts from stacks identified as SBP-5H(N), SBP-5I(N), SBP-5J(N), SBP-5K(N), and SBP-5E(S) for Paper Trim Cyclones #1(N), #2(N), #3(N), #4(N), #1(S), #2(S), #3(S) and #4(S) ~~when venting to the atmosphere.~~ **The Permittee shall include in its daily record any days when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).**
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Additional Change #5:

OAQ has revised its compliance monitoring requirements for thermal oxidizers. These changes are reflected in new Conditions D.3.11 and D.3.12, as follows:

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

D.3.11 Parametric Monitoring

- (a) ~~A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.~~
- (b) ~~The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within the range as established in most recent compliant stack test.~~
- (c) ~~If the reading is outside the above established range for any one reading, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

D.3.11 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on each thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate each thermal oxidizer at or above the 3-hour average temperature of 1350°F.**
- (b) The Permittee shall determine, for each thermal oxidizer, the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with the control efficiency requirement in Condition D.3.1(e)(1), as approved by IDEM.**
- (c) On and after the date the approved stack test results are available, the Permittee shall operate each thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.**

D.3.12 Parametric Monitoring

- (a) The Permittee shall determine, for each thermal oxidizer, the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the control efficiency requirement in Condition D.3.1(e)(1), as approved by IDEM.**
- (b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.**

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

[Subsequent conditions were renumbered.]

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

Appendix A to the Addendum to the Technical Support Document (TSD)
for a Significant Permit Modification to a Part 70 Operating Permit

Best Available Control Technology (BACT) Determination

Source Description and Location

Source Name:	R. R. Donnelley & Sons Company
Source Location:	1009 Sloan Street, Crawfordsville, IN 47933-2743
County:	Montgomery
SIC Code:	2732
Operation Permit No.:	107-5963-00052
Operation Permit Issuance Date:	June 21, 2002
Permit Modification No.:	107-23923-00052
Permit Reviewer:	Allen R. Davidson

Background and Description of Proposed Modification

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has performed the following state BACT (Best Available Control Technology) analysis for a modification relating to the operation of a book printing and binding operation located at 1009 Sloan Street, Crawfordsville, IN 47933-2743. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would change the VOC BACT determination for six (6) existing presses (Presses 260, 261, 262, 268, 269 and 273) when operating as nonheatset presses. These presses have already been permitted for VOC BACT when operating as heatset presses. This BACT analysis is required by 326 IAC 8-1-6.

New Emission Units and Pollution Control Equipment

The application does not involve the addition of any new emission units or pollution control equipment.

Existing Emission Units and Pollution Control Equipment

The application includes changes for the operation of the following equipment:

- (a) Two (2) web offset lithographic printing presses, controlled by one (1) 7.6 MMBtu per hour natural gas fired thermal oxidizer ("North Oxidizer") exhausting to one (1) stack identified as SP-5Y(N) in heatset mode, including:
 - (1) One (1) Mitsubishi web offset lithographic printing press with two (2) units and two (2) webs identified as Press 268 with a maximum line speed of 1600 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, exhausting to Vent SP-5AA(N) in nonheatset mode; and
 - (2) One (1) Toshiba web offset lithographic printing Press with four (4) units and two (2) webs identified as Press 269 with a maximum line speed of 1600 feet per minute and a maximum printing width of 50 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, exhausting to Vent SP-5BB(N) in nonheatset mode.

- (b) One (1) Mitsubishi web offset lithographic printing press with four (4) units and two (2) webs identified as Press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5N(S) in nonheatset mode.
- (c) One (1) Mitsubishi web offset lithographic printing press with four (4) units and two (2) webs identified as Press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5L(S) in nonheatset mode.
- (d) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5I(S) in nonheatset mode. The press may operate in either a heatset or nonheatset mode.
- (e) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 261 with a maximum line speed of 1500 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5J(S) in nonheatset mode.

BACT Description

BACT is defined as "an emission limitation based on the maximum degree of reduction of each pollutant subject to regulation under the Clean Air Act emitted from or which results from any major emitting facility, which the permitting authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such facility through application of production processes and available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of each such pollutant. In no event shall application of 'best available control technology' result in emissions of any pollutants which will exceed the emissions allowed by any applicable standard established pursuant to section 111 or 112 of this Act."

According to the "Top-Down Best Available Control Technology Guidance Document" outlined in the 1990 draft U.S. EPA New Source Review Workshop Manual, BACT analyses are conducted with a "top-down" approach which consists of the following steps:

- (1) Identify all potentially available control options;
- (2) Eliminate technically infeasible control options;
- (3) Rank remaining control technologies by control effectiveness;
- (4) Evaluate control options; and
- (5) Select BACT.

Also in accordance with the "Top-Down Best Available Control Technology Guidance Document" outlined in the 1990 draft U.S. EPA New Source Review Workshop Manual, BACT analyses (specifically Step 4) must take into account the energy, environmental, and economic impacts on the source. These reductions may be determined through the application of available control techniques, process design, and/or operational limitations. Such reductions are necessary to demonstrate that the emissions remaining after application of BACT will not cause or contribute to air pollution, thereby protecting public health and the environment. This BACT determination can be based upon, but not limited to, the following information:

- (1) The EPA RACT/BACT/LAER (RBLC) Clearinghouse;
- (2) U.S. EPA and State air quality permits;
- (3) Communications with control device equipment manufacturers;
- (4) The EPA New Source Review website;
- (5) Technical books and articles; and
- (6) Guidance documents from, and communications with, state agencies.

Best Available Control Technology (BACT) Review Requirements

Pursuant to 326 IAC 8-1-6, facilities that have potential emissions of twenty-five (25) tons or more per year and are not otherwise regulated by other provisions of 326 IAC 8 or certain provisions of 326 IAC 20 shall apply BACT for volatile organic compounds (VOC). The affected emission units are Presses 260, 261, 262, 268, 269 and 273.

Step 1: Identify Potentially Available Control Options

- (a) The BACT analysis submitted by R. R. Donnelley & Sons Company was verified by IDEM, OAQ, through the review of the various control technologies listed in the U.S. EPA BACT/RACT/LAER Clearinghouse. See the comparison table on Page 5 for a summary of the VOC BACT determinations for emission sources with nonheatset offset lithographic printing operations:

- (1) There were no add-on control requirements found for any of the nonheatset offset lithographic printing presses in the USEPA BACT/RACT/LAER Clearinghouse
- (2) A press at a Williams Printing Company facility in Georgia has a limit on the use of washes having a composite VOC vapor pressure not greater than 10 mm Hg at 20°C, or VOC content not greater than 2.5 pounds of VOC per gallon, as applied. This is the most stringent limit found for washes for nonheatset offset lithographic printing presses in the USEPA BACT/RACT/LAER Clearinghouse.

R. R. Donnelley & Sons Company is proposing the use of blanket and roller washes having a composite VOC vapor pressure not greater than 10 mm Hg at 20°C, or VOC content no greater than 2.5 pounds of VOC per gallon, as applied, which is comparable with the most stringent BACT found for nonheatset offset lithographic printing presses in the USEPA BACT/RACT/LAER Clearinghouse.

- (3) A press at a Sierra Office Systems facility in California has a limit of 8% VOC content for fountain solution, by weight. This is less stringent than a press at a Los Angeles Times Communications, LLC facility in California, and also less stringent than the BACT that R. R. Donnelley & Sons Company is proposing.
- (4) A press at a Los Angeles Times Communications, LLC facility in California has a limit of 0.17 lb VOC per gallon for fountain solution. This is the most stringent limit found for fountain solutions for nonheatset offset lithographic printing presses in the USEPA BACT/RACT/LAER Clearinghouse. (It equates to a limit of 2% VOC for fountain solutions, as applied.)

R. R. Donnelley & Sons Company is proposing the use of fountain solution with no greater than 2.0% VOC content by weight, as applied, which is comparable with the most stringent BACT found in the BACT/RACT/LAER Clearinghouse.

- (5) A press at a Melin Enterprises facility in California has a limit of 0.2 lb VOC per gallon for fountain solution. This is less stringent than a press at a Los Angeles Times Communications, LLC facility in California, and also less stringent than the BACT that R. R. Donnelley & Sons Company is proposing.
- (6) A press at a Pacific Southwest Container facility in California has a limit of 30% VOC content for inks, by weight, for high quality graphics similar to that performed by R. R. Donnelley & Sons Company. This is less stringent than a press at a Williams Printing Company facility in Georgia, and also less stringent than the BACT that R. R. Donnelley & Sons Company is proposing.

R. R. Donnelley & Sons Company is proposing the use of nonheatset inks with no greater than 2.5 pounds of VOC per gallon, as applied, which is comparable with the most stringent BACT found in the BACT/RACT/LAER Clearinghouse.

- (b) The BACT proposed by R. R. Donnelley & Sons for nonheatset operation is as stringent as the most stringent BACT determinations found for nonheatset offset lithographic printing presses in the USEPA BACT/RACT/LAER Clearinghouse. The proposed BACT consists of the following:
 - (1) the use of inks with no greater than 2.5 pounds of VOC per gallon, as applied;
 - (2) the use of fountain solution with no greater than 2.0% VOC content by weight, as applied; and
 - (3) the use of blanket and roller washes having:
 - (A) vapor pressure not greater than 10 mm Hg at 20 degrees C, or
 - (B) no greater than 2.5 pounds of VOC per gallon, as applied.

**Summary of BACT Determinations for
 Nonheatset Offset Lithographic Printing Operations
 (arranged most recent permit date first)**

Date	State	RBLC ID	Source	Affected Facility	BACT Determination
pending	IN		R.R. Donnelley & Sons Company	Offset lithographic printing: non-heatset	(a) No add-on controls. (b) Low VOC content of inks, fountain solution and wash: 2.0% VOC in fountain solution. 10 mmHg vapor pressure or 2.5 lb VOC/gal blanket and roller washes. (c) 2.5 lb VOC/gal in inks.
04/05	GA	GA-0111	Williams Printing Company (an R.R. Donnelley Company)	Coldset sheetfed offset lithographic presses	(a) No add-on controls. (b) Low VOC content of inks, fountain solution and wash: 5% VOC in fountain solution. 10 mmHg composite VOC vapor pressure or 2.5 lb VOC/gal blanket wash. 25 mm Hg composite VOC vapor pressure or 2.5 lb VOC/gal manual cleaning solvent. (c) 2.5 lb VOC/gal inks, coatings and varnishes. (LAER)
01/03	CA	CA-0992	Sierra Office Systems	Lithographic printing press and infrared dryer	(a) No add-on controls. (b) Rule compliant cleaning and inks and 8% VOC in fountain solution. (LAER)
12/00	CA	CA-1063	Los Angeles Times Communications, LLC	Lithographic offset printing: non-heatset.	(a) No add-on controls. (b) VOC of fountain solution not to exceed 0.17 lb/gal. (c) Ink VOC < 300 g/l.
12/00	CA	CA-1064	Melin Enterprises, Direct Color	Lithographic offset printing: non-heatset.	(a) No add-on controls. (b) VOC of fountain solution not to exceed 0.2 lb/gal.
12/96	CA	CA-0806	Pacific Southwest Container	Offset lithographic non-heatset press.	(a) No add-on controls. (b) Use of materials with the following VOC contents: For high end graphics: Less than 30% VOC by weight for inks (less water and exempt compounds) and less than 15% by volume for fountain solutions.

Step 2: Eliminate Technologically Infeasible Control Options

The U.S. EPA Document "Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing" (EPA-453/R-06-002, September 2006) identifies three (3) technologically feasible options to reduce VOC emissions from offset lithographic printing; most heatset web offset lithographic printing dryers are equipped with a thermal oxidizer, catalytic oxidizer, or chiller condenser. However, the guidance document does not recommend any add-on controls for nonheatset (also known as coldset) offset lithographic printing. An excerpt from the document reads as follows:

"The limited VOC emissions that occur from sheet-fed and coldset web offset lithographic inks are diffuse and spread over a large area. These emissions are not amenable to add-on control. This is in contrast to the emissions associated with heatset offset web lithographic inks and heatset web letterpress inks, as the petroleum oils in those inks volatilize in a dryer and are more amenable to add-on control because they are emitted in a more concentrated form from a discrete source."

The use of a vapor condenser in nonheatset mode was found to be technologically infeasible. The low concentrations of VOC in the exhaust gas stream in nonheatset mode are not sufficient to make vapor condensation practical.

Step 3: Rank Remaining Control Options by Control Effectiveness

The use of either a thermal or catalytic oxidizer is estimated at up to 97% destruction efficiency. This estimate is supported by existing requirements contained in Part 70 permit 107-5963-00052 which require 97% destruction efficiency for oxidizer RTO-1.

Step 4: Evaluate Control Options

- (a) The use of the existing thermal oxidization system in nonheatset mode was found to be technologically feasible, but economically infeasible. The nonheatset process must use inks and solutions with lower VOC content than in heatset mode; also, the absence of drying allows more VOC to be retained in the paper. There are inherently fewer VOC emissions in nonheatset operation, resulting in a significantly higher cost per ton to use add-on controls compared to heatset operation. The cost of using the South Oxidizer to control emissions during nonheatset operation is estimated at more than \$12,200 per ton. The cost of using the North Oxidizer to control emissions during nonheatset operation is estimated at more than \$57,100 per ton.

**Summary of Energy Costs for Existing Thermal Oxidizers
 at R.R. Donnelley & Sons Company**

	South Plant Oxidizer	North Plant Oxidizer
Rated Heat Input (MMBtu/hr)	1.7	7.6
Operating Heat Input (MMBu/hr) with Low VOC Loading	1.45	4.09
Annual Natural Gas Consumption (Th)	127,020	358,284
Natural Gas Cost \$/DTh	\$10.18	\$10.18
Annual Gas Cost with Low VOC Loading	\$129,306	\$364,733
Electrical Consumption (Dryers and Oxidizers) (KW)	29.58	29.35
Annual Electrical Consumption (KWH)	259,121	257,106
Electrical Cost per KWH	\$0.05	\$0.05
Annual Electrical Cost	\$12,956	\$12,855
Total Energy Cost	\$142,262	\$377,588

Methodology:
 Annual Natural Gas Consumption (Th) * Natural Gas Cost \$/DTh / 10 Th per DTh = Annual Gas Cost
 Annual Electrical Consumption (KWH) * Electrical Cost per KWH = Annual Electrical Cost
 Annual Gas Cost + Annual Electrical Cost = Total Energy Cost

Since the thermal oxidizers are existing, there are no setup costs associated with their use.

**Cost per Ton Analysis for Using Existing Thermal Oxidizers on
 Nonheatset Offset Lithographic Printing Operations**

	South Plant Oxidizer	North Plant Oxidizer
VOC Emissions Before Control (ton/year)	12.19	7.34
Control Efficiency (%)	95%	90%
Total VOC Destroyed (ton/year)	11.58	6.61
Cost per Ton VOC Destroyed (\$/ton)	\$12,285	\$57,158

Assumptions: All presses operating at maximum capacity in nonheatset mode only, with exhaust to their respective oxidizers at all times.

Methodology:
 VOC Emissions Before Control (ton/year) * Control Efficiency (%) = Total VOC Destroyed (ton/year)
 Total VOC Destroyed (ton/year) / Total Energy Cost = Cost per Ton VOC Destroyed (\$/ton)

- (b) The use of a catalytic oxidization system in nonheatset mode was found to be technologically feasible, but since catalytic oxidization will have significant setup costs that are not necessary for the existing thermal oxidizers, it can be presumed to be economically infeasible since thermal oxidation is not economically feasible.

Step 5: Select BACT

The BACT determination for Presses 260, 261, 262, 268, 269 and 273 shall be as follows:

- (a) For heatset mode:
- (1) Presses 268 and 269 will be controlled by the North Oxidizer, a 7.6 MMBtu/hr thermal oxidizer, and 260, 261, 262 and 273 will be controlled by the South Oxidizer, a 1.7 MMBtu/hr thermal oxidizer. The thermal oxidizers shall be in operation at all times during which any of the printing presses controlled by the oxidizers are operating in heatset mode.
 - (2) Pursuant to CP 107-2726 issued on February 26, 1993 and CP 107-2917 issued on April 6, 1993, Presses 268 and 269 shall not be operated in heatset mode until such time that the combustion temperature in the thermal afterburner has attained the minimum temperature determined in testing requirements to destroy at least 90% of captured VOC.
 - (3) Presses 260, 261, 262, and 273 shall not be operated in heatset mode until such time that the combustion temperature in the thermal afterburner has attained the minimum temperature determined in testing requirements to destroy at least 97% of captured VOC.
- (b) For nonheatset mode:
- (1) The inks used by that press shall not contain greater than 2.5 pounds of VOC per gallon, as applied;
 - (2) The fountain solution used by that press shall not contain greater than 2.0% VOC content by weight, as applied; and
 - (3) The solvents used for blanket and roller washes by that press shall comply with at least one of the following:
 - (A) The solvent shall not have a vapor pressure greater than 10 mm Hg at 20 degrees C, or
 - (B) The solvent shall not contain greater than 2.5 pounds of VOC per gallon, as applied.

Compliance with these requirements satisfies the best available control technology (BACT) requirement in 326 IAC 8-1-6 for both heatset and nonheatset modes.

Indiana Department of Environmental Management Office of Air Quality

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

Source Description and Location

Source Name:	R. R. Donnelley & Sons Company
Source Location:	1009 Sloan Street, Crawfordsville, IN 47933-2743
County:	Montgomery
SIC Code:	2732
Operation Permit No.:	107-5963-00052
Operation Permit Issuance Date:	June 21, 2002
Permit Modification No.:	107-23347-00052
Permit Reviewer:	Allen R. Davidson

Existing Approvals

The emission source was issued Part 70 Operating Permit 107-5963-00052 on June 21, 2002. The source has since received the following approvals:

- (a) Administrative Amendment 107-17119-00052, issued on February 4, 2003, which changed descriptive language for Press 258.
- (b) Significant Permit Modification 107-16731-00052, issued on March 28, 2003, which removed monitoring conditions for eight paper trim cyclones.
- (c) Administrative Amendment 107-17255-00052, issued on April 8, 2003, which replaced an existing paper dust collector with cyclones followed by baghouses.
- (d) Administrative Amendment 107-17454-00052, issued on July 25, 2003, which removed an existing paper dust collector and changed the identification number of Press 241 to Press 281.
- (e) Administrative Amendment 107-18767-00052, issued on March 15, 2004, which moved In-Line Stainer 192 from the North Plant to the South Plant.
- (f) Minor Permit Modification 107-21171-00052, issued on August 5, 2005, which added regenerative thermal oxidation to Presses 260, 261, 262 and 273. This modification also implemented updates, additions and corrections to various conditions in Sections B and C of the permit.
- (g) Minor Source Modification 107-22646-00052, issued on April 3, 2006, which added Press 250 to the South Plant.
- (h) Minor Permit Modification 107-22728-00052, issued on June 1, 2006, which incorporated the requirements of Minor Source Modification 107-22646-00052 into the Part 70 permit.
- (i) Administrative Amendment 107-22827-00052, issued on June 21, 2006, which removed Press 251 from the Part 70 permit and allows twenty-five (25) existing web offset lithographic printing presses to operate in either heatset or nonheatset mode.

County Attainment Status

The emission source is located in Montgomery County.

Pollutant	Status
PM ₁₀	attainment
PM _{2.5}	attainment
SO ₂	attainment
NO ₂	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The permanent revision to 326 IAC 1-4-1 took effect on October 25, 2006.

- (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. Montgomery 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) Montgomery County has been classified as 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 PM₁₀ emissions as a surrogate for PM_{2.5} emissions.
- (c) Montgomery County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

See "Permit Level Determination – PSD" for more details regarding PSD applicability.

Source Status

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

Pollutant	Potential to Emit (tons/yr)
PM	less than 250
PM ₁₀	less than 250
SO ₂	less than 250
VOC	greater than 250
CO	less than 250
NO _x	less than 250

- (a) This emission source, a book printing and binding operation, is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is classified as a major stationary source under PSD (326 IAC 2-2). Although it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1), a regulated pollutant is emitted at a rate of 250 tons per year or more.

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

HAPs	Potential to Emit (tons/yr)
Single HAP	greater than 10
Total HAPs	greater than 25

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

Background and Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by R. R. Donnelley & Sons Company on June 28, 2006, relating to the operation of a book printing and binding operation located at 1009 Sloan Street, Crawfordsville, IN 47933-2743. The application involves a request to re-evaluate the VOC best available control technology (BACT) for six (6) existing presses (Presses 260, 261, 262, 268, 269 and 273) when operating as nonheatset presses.

These presses have already been permitted for VOC BACT when operating as heatset presses. See "State Rule Applicability Determination - Presses 260, 261, 262, 273, 268, and 269" for details regarding previous permits.

New Emission Units and Pollution Control Equipment

The application does not involve the addition of any new emission units or pollution control equipment.

Existing Emission Units and Pollution Control Equipment

The application includes changes for the operation of the following equipment:

- (a) Two (2) web offset lithographic printing presses, controlled by one (1) 7.6 MMBtu per hour natural gas fired thermal oxidizer ("North Oxidizer") exhausting to one (1) stack identified as SP-5Y(N) in heatset mode, including:
 - (1) One (1) Mitsubishi web offset lithographic printing press with two (2) units and two (2) webs identified as Press 268 with a maximum line speed of 1600 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, exhausting to Vent SP-5AA(N) in nonheatset mode; and

- (2) One (1) Toshiba web offset lithographic printing Press with four (4) units and two (2) webs identified as Press 269 with a maximum line speed of 1600 feet per minute and a maximum printing width of 50 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, exhausting to Vent SP-5BB(N) in nonheatset mode.
- (b) One (1) Mitsubishi web offset lithographic printing press with four (4) units and two (2) webs identified as Press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5N(S) in nonheatset mode.
- (c) One (1) Mitsubishi web offset lithographic printing press with four (4) units and two (2) webs identified as Press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5L(S) in nonheatset mode.
- (d) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5I(S) in nonheatset mode. The press may operate in either a heatset or nonheatset mode.
- (e) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 261 with a maximum line speed of 1500 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) in heatset mode or Vent SP-5J(S) in nonheatset mode.

Insignificant Activities

This application does not involve any insignificant activities, as defined in 326 IAC 2-7-1(21).

Enforcement Issues

There are no enforcement actions pending against this emission source.

Stack Summary

The following table summarizes the stack/vent IDs for the six (6) existing presses:

Press	Stack/Vent ID in Heatset Mode	Stack/Vent ID in Nonheatset Mode
260	SP-5T(S) (South Oxidizer)	SP-5I(S)
261		SP-5J(S)
262		SP-5N(S)
273		SP-5L(S)
268	SP-5Y(N)	SP-5AA(N)
269	(North Oxidizer)	SP-5BB(N)

Administrative Amendment 107-22827-00052, issued on June 21, 2006, allows twenty-five (25) existing web offset lithographic printing presses to operate in either heatset or nonheatset mode. The amendment did not update the descriptive information on six (6) existing presses to account for operating in nonheatset mode. This application seeks to update the descriptive information.

Emission Calculations

Administrative Amendment 107-22827-00052, issued on June 21, 2006, allows twenty-five (25) existing web offset lithographic printing presses to operate in either heatset or nonheatset mode. All of the presses use lithographic ink with lower VOC content in the nonheatset mode than in the heatset mode. As a result, the emissions are lower for each press when operating in the nonheatset mode. However, the amount of VOC reduction was not quantified.

The emissions were calculated for Presses 260, 261, 262, 268, 269, and 273 in nonheatset mode. Based on 8760 hours of operation in nonheatset mode only, each of these presses has a potential to emit below the 25 ton per year applicability threshold of 326 IAC 8-1-6. Rule 326 IAC 8-1-6 is discussed in more detail later in the State Rule Applicability Determination section of this document.

See Appendix A of this document for detailed emission calculations. (7 pages)

Permit Level Determination – Part 70

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

The source modification does not change potential to emit. The potential to emit is based on the worst-case operating scenario, which is heatset mode.

Justification for Significant Permit Modification

The revision seeks to establish and to change Part 70 permit terms and conditions for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid the applicability of 326 IAC 8-1-6. As a result, this change cannot be processed as an Administrative Amendment under 326 IAC 2-7-11 and is expressly prohibited from being processed as a Minor Permit Modification under 2-7-12(b). It must be processed as a Significant Permit Modification under 326 IAC 2-7-12(d).

Permit Level Determination – PSD

The potential to emit is based on the worst-case operating scenario, which is heatset mode. This modification to an existing major stationary source is not major because the emissions increase is zero, and thus, less than the PSD significant levels for each regulated pollutant. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

326 IAC 12 and 40 CFR Part 60 (New Source Performance Standards (NSPS))

There are no New Source Performance Standards applicable to this proposed modification. 40 CFR 60 Subpart QQ, "Standards Of Performance For The Graphic Arts Industry: Publication Rotogravure Printing," is not applicable since the printing presses at this source are not rotogravure printing presses.

326 IAC 14, 326 IAC 20 and 40 CFR Part 63 (National Emission Standards for Hazardous Air Pollutants (NESHAPs))

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to this proposed modification. 40 CFR 63 Subpart KK, "National Emission Standards for the Printing and Publishing Industry," is not applicable since the printing presses at this source are not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.

State Rule Applicability Determination – Entire Source

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

This modification to an existing major stationary source is not major for Prevention of Significant Deterioration (PSD) because the emissions increase of all attainment regulated pollutants is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply to this modification.

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

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The source was existing as of July 27, 1997. Also, the modification by itself does not have potential to emit greater than ten (10) tons per year of any HAP or twenty-five (25) tons per year of any combination of HAPs.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, this source is subject to 326 IAC 2-6 (Emission Reporting). Also, the source has potential to emit greater than the thresholds in 326 IAC 2-6-3(a)(1). Therefore, pursuant to 326 IAC 2-6-3(a)(1), an emission statement covering the previous calendar year must be submitted by July 1 annually. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7 (Part 70 Permit Program)

This source is subject to the provisions of 326 IAC 2-7 due to the following:

- (a) The potential to emit of volatile organic compounds (VOC) is equal to or greater than one hundred (100) tons per year.
- (b) The potential to emit of hazardous air pollutant (HAP) emissions is greater than ten (10) tons per year for a single HAP.
- (c) The potential to emit of hazardous air pollutant (HAP) emissions is greater than twenty-five (25) tons per year for a combination of HAPs.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of 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.

State Rule Applicability Determination – Presses 260, 261, 262, 273, 268, and 269

326 IAC 8-2-5 (Paper Coating Operations)

Presses 260, 261, 262, 273, 268, and 269 are not subject to 326 IAC 8-2-5 (Paper Coating Operations). The rule does not apply since these printing presses do not fully saturate the substrate. This application does not change this determination.

326 IAC 8-5-5 (Graphic arts operations)

Presses 260, 261, 262, 273, 268, and 269 are not subject to 326 IAC 8-2-5 (Paper Coating Operations). The rule does not apply since these printing presses are not packaging rotogravure, publication rotogravure, or flexographic printing presses. This application does not change this determination.

326 IAC 8-1-6 (New facilities; General reduction requirements)

- (a) Presses 260, 261 and 273 were originally limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period, so that the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) would not apply. The original VOC limit on each of Presses 260, 261 and 273 is no longer necessary because these presses will be subject to BACT under 326 IAC 8-1-6.
 - (1) Presses 260, 261, 262 and 273 have already been reviewed for BACT under Minor Permit Modification 107-21171-00052, issued on August 5, 2005. This permit modification required the South Oxidizer as a VOC control device for Presses 260, 261, 262 and 273.

- (2) Presses 268 and 269 have already been reviewed for BACT under Construction Permits CP 107-2726, issued on February 26, 1993 and CP 107-2917, issued on April 6, 1993. These construction permits required the North Oxidizer as a VOC control device for Presses 268 and 269.
 - (3) R. R. Donnelley & Sons Company is not proposing the previous BACT determinations be changed for any press when operating in heatset mode. This BACT review is limited to the operation of Presses 260, 261, 262, 273, 268, or 269 in nonheatset mode.
- (b) Based on 8760 hours of operation in nonheatset mode only, each of these presses has a potential to emit below the applicability threshold of 326 IAC 8-1-6. Nonetheless, 326 IAC 8-1-6 will also apply to the presses when operating in the nonheatset mode due to the potential emissions of the heatset mode.
- (c) The table on the following page summarizes the VOC BACT determinations for emission sources with lithographic presses operating as nonheatset presses:
- (1) There were no add-on control requirements found for any of the nonheatset offset lithographic printing presses in the USEPA BACT/RACT/LAER Clearinghouse
 - (2) A press at a Williams Printing Company facility in Georgia has a limit on the use of washes having vapor pressure not greater than 10 mm Hg at 20 degrees C, or VOC content not greater than 2.5 pounds of VOC per gallon, as applied. This is the most stringent limit found for washes for nonheatset offset lithographic printing presses in the USEPA BACT/RACT/LAER Clearinghouse.

R. R. Donnelley & Sons Company is proposing the use of blanket and roller washes having vapor pressure not greater than 10 mm Hg at 20 degrees C, or VOC content no greater than 2.5 pounds of VOC per gallon, as applied, which is comparable with the most stringent BACT found for nonheatset offset lithographic printing presses in the USEPA BACT/RACT/LAER Clearinghouse.
 - (3) A press at a Sierra Office Systems facility in California has a limit of 8% VOC content for inks, by weight. This is less stringent than a press at a Pacific Southwest Container facility in California, and also less stringent than the BACT that R. R. Donnelley & Sons Company is proposing.
 - (4) A press at a Los Angeles Times Communications, LLC facility in California has a limit of 0.17 lb VOC per gallon for fountain solution. This is the most stringent limit found for fountain solutions for nonheatset offset lithographic printing presses in the USEPA BACT/RACT/LAER Clearinghouse. (It equates to a limit of 2% VOC for fountain solutions, as applied.)

R. R. Donnelley & Sons Company is proposing the use of fountain solution with no greater than 2.0% VOC content by weight, as applied, which is comparable with the most stringent BACT found in the BACT/RACT/LAER Clearinghouse.
 - (5) A press at a Melin Enterprises facility in California has a limit of 0.2 lb VOC per gallon for fountain solution. This is less stringent than a press at a Los Angeles Times Communications, LLC facility in California, and also less stringent than the BACT that R. R. Donnelley & Sons Company is proposing.

- (6) A press at a Pacific Southwest Container facility in California has a limit of 5% VOC content for inks, by weight. This is the most stringent limit found for inks for nonheatset offset lithographic printing presses in the USEPA BACT/RACT/LAER Clearinghouse. (It equates to a limit of 0.41 pounds per gallon of VOC, or to 49.5 grams per liter of VOC, for inks.)

R. R. Donnelley & Sons Company is proposing the use of nonheatset inks with no greater than 5.0% VOC content by weight, as applied, which is comparable with the most stringent BACT found in the BACT/RACT/LAER Clearinghouse.

**Summary of BACT Determinations for
 Nonheatset Offset Lithographic Printing Operations
 (arranged most recent permit date first)**

Date	State	RBLC ID	Source	Affected Facility	BACT Determination
pending	IN		R.R. Donnelley & Sons Company	Offset lithographic printing: non-heatset	(a) No add-on controls. (b) Low VOC content of inks, fountain solution and wash: 2.0% VOC in fountain solution. 10 mmHg vapor pressure or 2.5 lb VOC/gal blanket and roller washes. (c) 5.0% VOC in inks.
04/05	GA	GA-0111	Williams Printing Company (an R.R. Donnelley Company)	Coldset sheetfed offset lithographic presses	(a) No add-on controls. (b) Low VOC content of inks, fountain solution and wash: 5% VOC in fountain solution. 10 mmHg vapor pressure or 2.5 lb VOC/gal blanket wash. 25 mm Hg vapor pressure or 2.5 lb VOC/gal manual cleaning solvent. (c) 2.5 lb VOC/gal inks, coatings and varnishes. (LAER)
01/03	CA	CA-0992	Sierra Office Systems	Lithographic printing press and infrared dryer	(a) No add-on controls. (b) Rule compliant cleaning and inks and 8% VOC in fountain solution. (LAER)
12/00	CA	CA-1063	Los Angeles Times Communications, LLC	Lithographic offset printing: non-heatset.	(a) No add-on controls. (b) VOC of fountain solution not to exceed 0.17 lb/gal. (c) Ink VOC < 300 g/l.
12/00	CA	CA-1064	Melin Enterprises, Direct Color	Lithographic offset printing: non-heatset.	(a) No add-on controls. (b) VOC of fountain solution not to exceed 0.2 lb/gal.
12/96	CA	CA-0806	Pacific Southwest Container	Offset lithographic non-heatset press.	(a) No add-on controls. (b) Use of materials with the following VOC contents: Less than 5% VOC by weight for inks (less water and exempt compounds) and less than 6% by volume for fountain solutions. (c) For high end graphics: Less than 30% VOC by weight for inks (less water and exempt compounds) and less than 15% by volume for fountain solutions.

- (d) The U.S. EPA Document "Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing" (EPA-453/R-06-002, September 2006) identifies three (3) technologically feasible options to reduce VOC emissions from offset lithographic printing; most heatset web offset lithographic printing dryers are equipped with a thermal oxidizer, catalytic oxidizer, or chiller condenser. However, the guidance document does not recommend any add-on controls for nonheatset (also known as coldset) offset lithographic printing. An excerpt from the document reads as follows:
- "The limited VOC emissions that occur from sheet-fed and coldset web offset lithographic inks are diffuse and spread over a large area. These emissions are not amenable to add-on control. This is in contrast to the emissions associated with heatset offset web lithographic inks and heatset web letterpress inks, as the petroleum oils in those inks volatilize in a dryer and are more amenable to add-on control because they are emitted in a more concentrated form from a discrete source."
- (e) The use of a vapor condenser in nonheatset mode was found to be technologically infeasible. The low concentrations of VOC in the exhaust gas stream in nonheatset mode are not sufficient to make vapor condensation practical.
- (f) The use of the existing thermal oxidization system in nonheatset mode was found to be technologically feasible, but economically infeasible. The nonheatset process must use inks and solutions with lower VOC content than in heatset mode; also, the absence of drying allows more VOC to be retained in the paper. There are inherently fewer VOC emissions in nonheatset operation, resulting in a significantly higher cost per ton to use add-on controls compared to heatset operation. The cost of using the South Oxidizer to control emissions during nonheatset operation is estimated at more than \$12,200 per ton. The cost of using the North Oxidizer to control emissions during nonheatset operation is estimated at more than \$57,100 per ton.

**Summary of Energy Costs for Existing Thermal Oxidizers
 at R.R. Donnelley & Sons Company**

	South Plant Oxidizer	North Plant Oxidizer
Rated Heat Input (MMBtu/hr)	1.7	7.6
Operating Heat Input (MMBu/hr) with Low VOC Loading	1.45	4.09
Annual Natural Gas Consumption (Th)	127,020	358,284
Natural Gas Cost \$/DTh	\$10.18	\$10.18
Annual Gas Cost with Low VOC Loading	\$129,306	\$364,733
Electrical Consumption (Dryers and Oxidizers) (KW)	29.58	29.35
Annual Electrical Consumption (KWH)	259,121	257,106
Electrical Cost per KWH	\$0.05	\$0.05
Annual Electrical Cost	\$12,956	\$12,855
Total Energy Cost	\$142,262	\$377,588

Methodology:

Annual Natural Gas Consumption (Th) * Natural Gas Cost \$/DTh / 10 Th per DTh = Annual Gas Cost
 Annual Electrical Consumption (KWH) * Electrical Cost per KWH = Annual Electrical Cost
 Annual Gas Cost + Annual Electrical Cost = Total Energy Cost

Since the thermal oxidizers are existing, there are no setup costs associated with their use.

**Cost per Ton Analysis for Using Existing Thermal Oxidizers on
 Nonheatset Offset Lithographic Printing Operations**

	South Plant Oxidizer	North Plant Oxidizer
VOC Emissions Before Control (ton/year)	12.19	7.34
Control Efficiency (%)	95%	90%
Total VOC Destroyed (ton/year)	11.58	6.61
Cost per Ton VOC Destroyed (\$/ton)	\$12,285	\$57,158

Assumptions: All presses operating at maximum capacity in nonheatset mode only, with exhaust to their respective oxidizers at all times.

Methodology:

VOC Emissions Before Control (ton/year) * Control Efficiency (%) = Total VOC Destroyed (ton/year)
 Total VOC Destroyed (ton/year) / Total Energy Cost = Cost per Ton VOC Destroyed (\$/ton)

- (e) The use of a catalytic oxidization system in nonheatset mode was found to be technologically feasible, but since catalytic oxidation will have significant setup costs that are not necessary for the existing thermal oxidizers, it can be presumed to be economically infeasible since thermal oxidation is not economically feasible.
- (f) The BACT proposed by R. R. Donnelley & Sons for nonheatset operation is as stringent as the most stringent BACT determinations found for nonheatset offset lithographic printing presses in the USEPA BACT/RACT/LAER Clearinghouse. The proposed BACT consists of the following:
 - (1) the use of inks with no greater than 5.0% VOC content by weight, as applied;
 - (2) the use of fountain solution with no greater than 2.0% VOC content by weight, as applied; and
 - (3) the use of blanket and roller washes having:
 - (A) vapor pressure not greater than 10 mm Hg at 20 degrees C, or
 - (B) no greater than 2.5 pounds of VOC per gallon, as applied.

BACT Determination for Presses 260, 261, 262, 273, 268, and 269

The BACT determination for Presses 260, 261, 262, 273, 268, and 269 shall be as follows:

- (a) For heatset mode:
 - (1) Presses 268 and 269 will be controlled by the North Oxidizer, a 7.6 MMBtu/hr thermal oxidizer, and 260, 261, 262 and 273 will be controlled by the South Oxidizer, a 1.7 MMBtu/hr thermal oxidizer. The thermal oxidizers shall be in operation at all times during which any of the printing presses controlled by the oxidizers are operating in heatset mode.

- (2) Pursuant to CP 107-2726 issued on February 26, 1993 and CP 107-2917 issued on April 6, 1993, Presses 268 and 269 shall not be operated in heatset mode until such time that the combustion temperature in the thermal afterburner has attained the minimum temperature determined in testing requirements to destroy at least 90% of captured VOC.
 - (3) Presses 260, 261, 262, and 273 shall not be operated in heatset mode until such time that the combustion temperature in the thermal afterburner has attained the minimum temperature determined in testing requirements to destroy at least 97% of captured VOC.
- (b) For nonheatset mode:
- (1) The inks used by that press shall not contain greater than 5.0% VOC content by weight, as applied;
 - (2) The fountain solution used by that press shall not contain greater than 2.0% VOC content by weight, as applied; and
 - (3) The solvents used for blanket and roller washes by that press shall comply with at least one of the following:
 - (A) The solvent shall not have a vapor pressure greater than 10 mm Hg at 20 degrees C, or
 - (B) The solvent shall not contain greater than 2.5 pounds of VOC per gallon, as applied.

Compliance with these requirements satisfies the best available control technology (BACT) requirement in 326 IAC 8-1-6 for both heatset and nonheatset modes.

Proposed Changes

In addition to the changes directly related to the modification, OAQ made the following revisions to the Part 70 permit:

- (a) All references to the emission source's ZIP code have been revised to read 47933-2743.
- (b) All instances of PM-10 in the permit have been changed to read PM₁₀.
- (c) OAQ has updated the telephone and fax numbers for the OAQ Compliance Section.
- (d) OAQ has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, OAQ has deleted paragraph (b) of Section B - Preventive Maintenance Plan, and has amended Section B - Emergency Provisions.
- (e) For clarification purposes, OAQ has revised Section B - Operational Flexibility.

- (f) OAQ has added a condition for Credible Evidence to Section B of the permit.
- (g) OAQ has updated Section C - Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour, to reflect changes in 236 IAC 6-3-2 and 40 CFR 52 Subpart P.
- (h) In order to avoid duplication of requirements which may be included in D sections, Section C - Operation of Equipment, has been removed from the permit.
- (i) OAQ has reconsidered the requirement to develop and follow a Compliance Response Plan in Section C. 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. OAQ will replace the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps, to 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 titled "Compliance Response Plan - Preparation, Implementation, Records, and Reports" has been replaced by the condition titled "Response to Excursions or Exceedances". The Section D conditions that referred to the old condition title have been revised to refer to the new condition title. (See the changes shown later in the Proposed Changes section for more details.)
- (j) OAQ updated Section C - General Record Keeping Requirements and Section C - General Reporting Requirements, to reflect changes in 326 IAC 2-2.
- (k) Section C - Risk Management Plan has been simplified.
- (l) The Table of Contents will be updated to reflect new and deleted conditions.

The changes listed below are being proposed to Part 70 Operating Permit No. 107-5963-00052. Deleted language appears as strikethroughs and new language appears in bold:

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

The Permittee owns and operates a book printing and binding operation.

Responsible Official:	Gary Calleo, Vice President and Division Director
Source Address:	1009 Sloan Street, Crawfordsville, Indiana IN 47933-2744 2743
Mailing Address:	1009 Sloan Street, Crawfordsville, Indiana IN 47933-2744 2743
Phone Number:	(765) 364-1300
SIC Code:	2732
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD

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

This book printing and binding operation ~~source~~ consists of the following emission units and pollution control devices:

North Plant:

- (1) Four (4) natural gas or propane fired boilers, with a maximum rating of 20.9 MMBtu (million British thermal units) per hour each:
 - (a) Boiler #1(N) with emissions exhausting through stack SB-4A(N).
 - (b) Boiler #2(N) with emissions exhausting through stack SB-4B(N).
 - (c) Boiler #3(N) with emissions exhausting through stack SB-4C(N).
 - (d) Boiler #4(N) with emissions exhausting through stack SB-4D(N).
- (2) One (1) natural gas or propane fired boiler, with a maximum rating of 2.56 MMBtu (million British thermal units) per hour: Boiler #5(N) with emissions exhausting through stack SB-4E(N).
- (3) Four (4) Paper Trim Cyclones:
 - (a) Paper Trim Cyclone #1(N) emissions exhausting through stack SBP-5H(N).
 - (b) Paper Trim Cyclone #2(N) emissions exhausting through stack SBP-5I(N).
 - (c) Paper Trim Cyclone #3(N) emissions exhausting through stack SBP-5J(N).
 - (d) Paper Trim Cyclone #4(N) emissions exhausting through stack SBP-5K(N).
- (4) Two (2) Paper Dust Collectors:
 - (a) Dust Collector #1(N) consists of a cyclone followed by a baghouse for particulate control and is exhausted through SD-6A(N).
 - (b) Dust Collector #2(N) consists of a baghouse for particulate control and is exhausted through SD-6B(N).
- (5) Two (2) web offset lithographic printing presses, controlled by one (1) 7.6 MMBtu per hour natural gas fired thermal oxidizer ("North Oxidizer") exhausting to one (1) stack identified as SP-5Y(N) **in heatset mode**, including:
 - (a) One (1) Mitsubishi web offset lithographic printing press with two (2) units and two (2) webs identified as Press 268 with a maximum line speed of 1600 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, **exhausting to Vent SP-5AA(N) in nonheatset mode**; and
 - (b) One (1) Toshiba web offset lithographic printing Press with four (4) units and two (2) webs identified as Press 269 with a maximum line speed of 1600 feet per minute and a maximum printing width of 50 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, **exhausting to Vent SP-5BB(N) in nonheatset mode**.
- (6) One (1) Hantscho web offset lithographic printing Press with two (2) units and two (2) webs identified as Press 240 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5R(N). The press may operate in either a heatset or nonheatset mode.

- (7) One (1) KBA Compacta web offset lithographic printing Press with two (2) units and two (2) webs identified as Press 281 with a maximum line speed of 1100 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5S(N). The press may operate in either a heatset or nonheatset mode.
- (8) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 245 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(N). The press may operate in either a heatset or nonheatset mode.
- (9) One (1) Timson web offset lithographic printing press with one (1) unit and one (1) web identified as Press 242 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Z(N). The press may operate in either a heatset or nonheatset mode.
- (10) One (1) Timson web offset lithographic printing press with one (1) unit and one (1) web identified as Press 243 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5AA(N). The press may operate in either a heatset or nonheatset mode.
- (11) One (1) Harris web offset lithographic printing press with two (2) units and two (2) webs identified as Press 285 with a maximum line speed of 825 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(N). The press may operate in either a heatset or nonheatset mode.
- (12) One (1) Harris web offset lithographic printing press with two (2) units and two (2) webs identified as Press 286 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5L(N). The press may operate in either a heatset or nonheatset mode.
- (13) One (1) Harris web offset lithographic printing press with four (4) units and two (2) webs identified as Press 287 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(N). The press may operate in either a heatset or nonheatset mode.
- (14) One (1) Harris web offset lithographic printing press with four (4) units and two (2) webs identified as Press 288 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5N(N). The press may operate in either a heatset or nonheatset mode.
- (15) One (1) Harris web offset lithographic printing press with four (4) units and two (2) webs identified as Press 289 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5O(N). The press may operate in either a heatset or nonheatset mode.
- (16) Four (4) UV sheetfed offset lithographic presses:
 - (a) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 232 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.

- (b) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 233 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.
- (c) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 238 with a maximum line speed of 434 feet per minute and a maximum printing width of 40 inches including six (6) units and coater, exhausting to one (1) stack SP-5V(N) used as cooling air for UV lamps.
- (d) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 239 with a maximum line speed of 473 feet per minute and a maximum printing width of 40 inches including two (2) units and coater, exhausting to one (1) stack SP-5W(N) used as cooling air for UV lamps.

South Plant:

- (1) Three (3) natural gas or propane fired boilers, with a maximum rating of 25.1 MMBtu (million British thermal units) per hour each:
 - (a) Boiler #1(S) with emissions exhausting through stack SB-4A(S).
 - (b) Boiler #2(S) with emissions exhausting through stack SB-4B(S).
 - (c) Boiler #3(S) with emissions exhausting through stack SB-4C(S).
- (2) Four (4) Paper Trim Cyclones:
 - (a) Paper Trim Cyclone #1(S) emissions exhausting through stack SBP-5E(S).
 - (b) Paper Trim Cyclone #2(S) emissions exhausting through stack SBP-5E(S).
 - (c) Paper Trim Cyclone #3(S) emissions exhausting through stack SBP-5E(S).
 - (d) Paper Trim Cyclone #4(S) emissions exhausting through stack SBP-5E(S).
- (3) Two (2) Paper Dust Collectors:
 - (a) Dust Collector #1(S) consists of a two (2) cyclones each followed by a baghouse (2 total) for particulate control and are exhausted through SD-6A(S) and new exhaust point SD6C(S).
 - (b) Dust Collector #2(S) consists of a baghouse for particulate control and is exhausted through SD-6B(S).
- (4) One (1) Mitsubishi web offset lithographic printing press with four (4) units and two (2) webs identified as Press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) **in heatset mode or Vent SP-5N(S) in nonheatset mode.**

- (5) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 270 with a maximum line speed of 807 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to SP-5F(S). The press may operate in either a heatset or nonheatset mode.
- (6) One (1) Cottrell web offset lithographic printing press with four (4) units and two (2) webs identified as Press 272 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5D(S). The press may operate in either a heatset or nonheatset mode.
- (7) One (1) Mitsubishi web offset lithographic printing press with four (4) units and two (2) webs identified as Press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) **in heatset mode or Vent SP-5L(S) in nonheatset mode.**
- (8) One (1) Cottrell web offset lithographic printing press with four (4) units and two (2) webs identified as Press 276 with a maximum line speed of 1200 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5E(S). The press may operate in either a heatset or nonheatset mode.
- (9) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) **in heatset mode or Vent SP-5I(S) in nonheatset mode.** The press may operate in either a heatset or nonheatset mode.
- (10) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 261 with a maximum line speed of 1500 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) **in heatset mode or Vent SP-5J(S) in nonheatset mode.**
- (11) One (1) Hantscho web offset lithographic printing press with one (1) unit and one (1) web identified as Press 290 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5G(S). The press may operate in either a heatset or nonheatset mode.
- (12) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 291 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5H(S). The press may operate in either a heatset or nonheatset mode.
- (13) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 293 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(S). The press may operate in either a heatset or nonheatset mode.

- (14) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 294 with a maximum line speed of 1076 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(S). The press may operate in either a heatset or nonheatset mode.
- (15) One (1) Hantscho web offset lithographic printing press with two (2) units and two (2) webs identified as Press 295 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5P(S). The press may operate in either a heatset or nonheatset mode.
- (16) One (1) Harris web offset lithographic printing press with two (2) units and two (2) webs identified as Press 296 with a maximum line speed of 860 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(S). The press may operate in either a heatset or nonheatset mode.
- (17) One (1) Heidelberg sheetfed offset lithographic press identified as Press 258 with a maximum line speed of 505 feet per minute and a maximum printing width of 40.5 inches including six (6) units and coater, exhausting to one (1) stack SP-5R(S) used as cooling air for electric heaters.
- (18) One (1) In-line Stainer 192 used for edge staining paper using low pressure-high volume spray coating and using dry filters for overspray control and exhausting through stack BS-4X(N).
- (19) One (1) nonheatset, sheet-fed, offset lithographic printing press, identified as Press 250, constructed in 2006, exhausting to stack SP-5U(s), capacity: 13,000 sheets (14.56 million square inches) per hour.

B.1 — Definitions [326 IAC 2-7-1]

~~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 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) ~~This permit, T 107-5963-00052 is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.~~
- (b) ~~If IDEM, OAQ, upon receiving a timely and complete renewal 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 — Enforceability [326 IAC 2-7-7]

~~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.4 — Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]~~

~~The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).~~

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

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

~~B.6 — Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]~~

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

~~B.7 — Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
[326 IAC 2-7-6(6)]~~

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

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

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

~~(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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U.S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]~~

~~(c) — The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.~~

~~B.8 — Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]~~

~~(a) — The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

~~(1) — Enforcement action;~~

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

~~(3) — Denial of a permit renewal application.~~

~~(b) — Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.~~

- (c) ~~It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~
- (d) ~~An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.~~

~~B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]~~

- (a) ~~Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~
- (b) ~~One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.~~
- (c) ~~A responsible official is defined at 326 IAC 2-7-1(34).~~

~~B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]~~

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

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

~~and~~

~~United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590~~

- (b) ~~The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~
- (c) ~~The annual compliance certification report shall include the following:~~
 - (1) ~~The appropriate identification of each term or condition of this permit that is the basis of the certification;~~

- ~~(2) — The compliance status;~~
- ~~(3) — Whether compliance was continuous or intermittent;~~
- ~~(4) — The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and~~
- ~~(5) — Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.~~

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

~~B.11 — Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 4-6-3]~~

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

- ~~(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 and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

- ~~(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 “responsible official” as defined by 326 IAC 2-7-1(34).~~

- ~~(d) — Records of preventive maintenance shall be retained for a period of at least five (5) years. 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.12 — Emergency Provisions [326 IAC 2-7-16]~~

- ~~(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 2-7-16.~~
- ~~(b) — An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:~~
- ~~(1) — An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;~~
 - ~~(2) — The permitted facility was at the time being properly operated;~~
 - ~~(3) — During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;~~
 - ~~(4) — For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;~~

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

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

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2254~~

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

~~The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:~~

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

~~The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(6) — The Permittee immediately took all reasonable steps to correct the emergency.~~
- ~~(c) — In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.~~
- ~~(d) — This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.~~
- ~~(e) — IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.~~
- ~~(f) — Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.~~
- ~~(g) — 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 materials of substantial economic value.~~~~~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

~~B.13 — Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]~~

- ~~(a) — Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a~~

~~determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.~~

~~This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.~~

- ~~(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- ~~(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.~~
- ~~(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - ~~(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;~~
 - ~~(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;~~
 - ~~(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and~~
 - ~~(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.~~~~
- ~~(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).~~
- ~~(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]~~
- ~~(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]~~

~~B.14 Prior Permits Superseded [326 2-1.1-9.5]~~

- ~~(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either~~

~~(1) — incorporated as originally stated,~~

~~(2) — revised, or~~

~~(3) — deleted,~~

~~by this permit.~~

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

~~B.15 — Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

~~(c) — Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

~~B.16 — Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]~~

~~(a) — This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(b) — This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:~~

~~(1) — That this permit contains a material mistake.~~

~~(2) — That inaccurate statements were made in establishing the emissions standards or other terms or conditions.~~

- ~~(3) — That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]~~
- ~~(c) — Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]~~
- ~~(d) — The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]~~

~~B.17 — Permit Renewal [326 IAC 2-7-4]~~

- ~~(a) — The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

~~Request for renewal shall be submitted to:~~

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

- ~~(b) — Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]~~
- ~~(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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.~~
- ~~(c) — Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the~~

~~deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.~~

- ~~(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.~~

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

- ~~(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.~~
- ~~(b) Any application requesting an amendment or modification of this permit shall be submitted to:~~

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

~~Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~

~~B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12(b)(2)]~~

- ~~(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.~~
- ~~(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.~~

~~B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]~~

- ~~(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:~~
- ~~(1) The changes are not modifications under any provision of Title I of the Clean Air Act;~~
- ~~(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;~~

~~(3) — The changes do not result in emissions which exceed the emissions allowable under 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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.~~

~~Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).~~

~~(b) — The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~

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

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

~~(3) — Any change in emissions; and~~

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

~~The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(c) — Emission Trades [326 IAC 2-7-20(c)]~~

~~The Permittee may trade 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 2-7-20(c).~~

- (d) ~~Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.~~
- (e) ~~Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.~~

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

~~A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.~~

B.22 Inspection and Entry [326 IAC 2-7-6] [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 upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;~~
- (b) ~~Have access to and copy any records that must be kept under the conditions of this permit;~~
- (c) ~~Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;~~
- (d) ~~Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and~~
- (e) ~~Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.~~

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

- (a) ~~The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.~~
- (b) ~~Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:~~

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

~~The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(e)(3)]~~

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

- ~~(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.~~
- ~~(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.~~
- ~~(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.~~

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

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

B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)]
[IC 13-15-3-6(a)]**

- (a) This permit, T107-5963-00052, 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 2-7-7]

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

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

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

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

- (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, IN 46204-2251**

and

**United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, IL 60604-3590**

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.**
- (c) The annual compliance certification report shall include the following:**
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;**
 - (2) The compliance status;**
 - (3) Whether compliance was continuous or intermittent;**
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and**
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.**

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

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

-
- (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, IN 46204-2251**

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

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

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

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

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification, which shall be submitted by the Permittee, does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.**
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.**
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.**
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.**
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.**
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions. The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements, which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

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

- (a) All terms and conditions of permits established prior to T107-5963-00052 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

- (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, IN 46204-2251

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.
[326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;**
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;**
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);**
- (4) The Permittee notifies the:**

**Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 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, IL 60604-3590**

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:**

- (1) A brief description of the change within the source;**
- (2) The date on which the change will occur;**
- (3) Any change in emissions; and**
- (4) Any permit term or condition that is no longer applicable as a result of the change.**

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.**

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

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

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

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

~~Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

~~C.2 — Opacity [326 IAC 5-1]~~

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

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

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

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

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

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

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

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

~~C.6 — Operation of Equipment [326 IAC 2-7-6(6)]~~

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

~~C.7 — Stack Height [326 IAC 1-7]~~

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

~~C.8 — 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 notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) ~~Procedures for Asbestos Emission Control~~
~~The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10.1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~
- (f) ~~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, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.~~

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

C.9 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 the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source 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.10 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 2-7-5(1)] [326 IAC 2-7-6(1)]~~

~~C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.~~

~~C.12 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.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]~~

- ~~(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.~~
- ~~(b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.~~
- ~~(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.~~

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

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

~~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 46204-2254~~

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

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

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

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

~~C.15 — Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]~~

~~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; 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);~~

~~All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

~~C.16 — Compliance Response Plan Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]~~

- ~~(a) — The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - ~~(1) — Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.~~
 - ~~(2) — If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee’s current Compliance Response Plan and the Permittee documents such response in accordance with subsection (c) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~~~
- ~~(b) — For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - ~~(1) — Reasonable response steps shall be taken as set forth in the Permittee’s current Compliance Response Plan; or~~~~

- ~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~
 - ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.~~
 - ~~(4) Failure to take reasonable response steps shall constitute a violation of the permit.~~
 - ~~(c) The Permittee is not required to take any further response steps for any of the following reasons:
 - ~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
 - ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~
 - ~~(3) An automatic measurement was taken when the process was not operating.~~
 - ~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~~~
 - ~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
 - ~~(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
 - ~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- ~~C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]~~
- ~~(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 documents submitted pursuant to this condition do not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

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

~~C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(e)] [326 IAC 2-6]~~

~~Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:~~

- (a) ~~Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);~~
- (b) ~~Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.~~

~~The statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2254~~

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

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

~~C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]~~

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

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

- ~~(a) — The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(b) — The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~
- ~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251~~
- ~~(c) — Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~
- ~~(d) — Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~
- ~~(e) — The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.~~

Stratospheric Ozone Protection

~~C.21 — 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.~~

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

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

Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which:

- (a) has a maximum process weight rate less than 100 pounds per hour, and
- (b) the methods in 326 IAC 6-3-2(b) through (d) do not apply

shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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, IN 46204-2251**

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control**

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-41, 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. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

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, IN 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source 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 2-7-5(1)] [326 IAC 2-7-6(1)]

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

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, IN 46204-2251**

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

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 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 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5] [326 IAC 2-7-6]

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 46204-2251**

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

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

- (c) **If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.**
- (d) **These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.**
- (e) **Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.**
- (f) **Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]**

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) **Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) **The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:**
 - (1) **initial inspection and evaluation;**
 - (2) **recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**
 - (3) **any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**
- (c) **A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
 - (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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 documents submitted pursuant to this condition do require the certification by the a responsible official as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

**Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**

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

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee)), may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr)), the Permittee shall comply with the following:
 - (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;

- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

- (f) **If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:**
- (1) **The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx), for that regulated NSR pollutant, and**
 - (2) **The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).**
- (g) **The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:**
- (1) **The name, address, and telephone number of the major stationary source.**
 - (2) **The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.**
 - (3) **The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).**
 - (4) **Any other information that the Permittee deems fit to include in this report.**

Reports required in this part shall be submitted to:

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

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

Stratospheric Ozone Protection

C.20 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.**

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-7-10.5(d)(5)(A)]

The following presses shall be limited as follows:

- (a) **Press 240, Press 281, Press 245, Press 289, Press 238, Press 239, Press 290, Press 291, Press 293, Press 294, Press 295, and Press 296:**

The VOC content delivered to the applicator of each press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

For each press, VOC emitted will shall be based on the following equation:

VOC emissions (tpy) =
(ink usage **in heatset mode** * volatile content * 80% flash off) +
(ink usage in nonheatset mode * volatile content * 5% flash off) +
(fountain solution usage * volatile content * 100% flash off) +
(manual cleaner usage * volatile content * 50% flash off) +
(automatic cleaner usage * volatile content * 100% flash off)

The following presses shall be limited:

~~Press 240, Press 281, Press 245, Press 289, Press 238, Press 239, Press 260, Press 261, Press 273, Press 290, Press 291, Press 293, Press 294, Press 295, and Press 296~~

- (1) The requirements from Registered Construction and Operation Status letter issued June 19, 1988 (Press 240), and Registered Construction and Operation Status letter issued October 23, 1991 (Press 281), state that "Any change or modification which may increase the volatile organic compound potential emissions to 25 tons per year or more from the equipment covered in this registration must be approved by OAQ before such change may occur." The previous operating permits did not anticipate that the potential emissions would be greater than 25 tons per year and therefore did not address the requirements of 326 IAC 8-1-6. The source limited the running time in order to keep VOC emissions below 25 tons per year.

Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.

~~The requirements from Registered Construction and Operation Status letter issued on November 8, 1989 and Registered Construction and Operation Status letter issued on February 2, 1987 (Press 260 and Press 261) to limit VOC emissions by limiting running time to 5000 hours per year; and PC (54) 1853 issued October 20, 1990 limiting impressions, and usage of ink, fountain solution,~~

~~and cleaning solution, maintain a log of information and submit a quarterly report for monthly hour usage are replaced with the new limits.~~

- (2) The requirements from PC (54) 1746 issued on May 3, 1989 (Press 245) limiting hours of operation, limiting by press description, maintenance of a log of information and quarterly reporting of hours used ; PC (54) 1740 issued on April 5, 1989 (Press 293) limiting hours of operation, limiting by press description; Registered Construction (107) 2045 issued October 17, 1991 (Press 294) limiting by press description and pound per hour of ink and solution usage; Registered Construction and Operation Status CP 107-2947 issued April 23, 1993 (Press 296) limiting by press description; and Registered Construction and Operation Status CP 107-3433 issued January 21, 1994 (Press 296) limiting by press description are replaced with the new limits.

Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.

- (3) The requirements from PC (54) 1257 issued July 11, 1978 (Press 287 and Press 288), PC (34) 1285 issued on September 6, 1978 (Press 286) and PC (54) 1398 issued on June 18, 1979 limiting hydrocarbons (Press 270) and requiring the use of non-photochemically reactive hydrocarbons, are replaced because these presses were constructed prior to January 1, 1980 and are not subject to Article 8 rules. Also included are presses Press 285, Press 272, and Press 276 which were also built prior to January 1, 1980.

Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.

- (4) Exempt Construction and Operation Status CP 107-4781 issued September 28, 1995 (Press 258) is replaced by a new limitation on potential to emit of 10 tons per year. Any change or modification which may increase the volatile organic compound potential emissions to more than 10 tons per year must be reported to IDEM, OAQ.

~~Remaining presses will be limited as follows:~~

(b) **Press 232 and Press 233:**

The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons combined pressroom emissions from Press 232 and Press 233 (combined) per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

For these two presses, total VOC emitted will shall be based on the following equation:

VOC emissions (tpy) =
(ink usage * volatile content * 80% flash off) +
(fountain solution usage * volatile content * 100% flash off) +
(manual cleaner usage * volatile content * 50% flash off)

- (1) The requirements from Registered Construction and Operation Status (107) 2042 issued on July 11, 1991 (Press 232 and Press 233) to use an ultraviolet light

curing system to limit VOC releases from the ink, the requirements to use a less volatile printing aid than isopropyl alcohol, and **the requirements** limiting fountain solution to 2.5 percent VOC per gallon ~~is~~ **are** being replaced with new language and limits. ~~In~~ ~~because~~ ~~in~~ order to maintain consistency in permit language, reporting and monitoring, ~~it is intended~~ **the intent is** to limit the VOC, rather than hours, impressions, ~~and limiting~~ volatile content of solutions or press descriptions.

Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.

- (2) Amendment 107-10512-00052 issued March 15, 1999 allowed usage of isopropyl alcohol at 750 pounds per year as part of the fountain solution and shall remain in effect.

(c) **Press 242 and Press 243:**

Pursuant to CP 107-4233 issued April 20, 1995, **total** VOC input usage to ~~Presses~~ Press 242 and Press 243 shall ~~be~~ not exceed a combined 39 tons per year, based on 80% VOC flash-off during web heatset ink usage **and 5% VOC flash-off during web nonheatset ink usage**, calculated on a 12 month rolling monthly average. ~~That the~~ **The** total amount of VOC delivered to each press individually, including clean-up solvents, shall not exceed 25 tons per year, per press, based on 80% VOC flash-off during web heatset ink usage **and 5% VOC flash-off during web nonheatset ink usage**, calculated on a 12 month rolling monthly average.

(d) **Press 260, Press 261, Press 262, Press 273, Press 268 and Press 269:**

- (1) **When operating in heatset mode**, Presses 268 and 269 will be controlled by the North Oxidizer, a 7.6 MMBtu per ~~hr~~ **hour** thermal oxidizer, and ~~Press~~ **Presses 260, 261, 262 and 273** will be controlled by the South Oxidizer, a ~~4.894~~ **1.7** MMBtu per ~~hr~~ **hour** thermal oxidizer. The thermal oxidizers shall be in operation at all times during which any of the printing presses controlled by the oxidizers are ~~in operation~~ **operating in heatset mode**.

- (A) Pursuant to CP 107-2726 issued on February 26, 1993 and CP 107-2917 issued on April 6, 1993, the controls of the press, dryer and thermal afterburner for Presses and 269 shall be interlocked such that the press and dryer cannot **Presses 268 and 269 shall not be operated in heatset mode** until such time that the combustion temperature in the thermal afterburner has attained the minimum temperature determined in testing requirements to destroy at least 90% of captured VOC.

- (B) **Presses 260, 261, 262, and 273 shall not be operated in heatset mode until such time that the combustion temperature in the thermal afterburner has attained the minimum temperature determined in testing requirements to destroy at least 97% of captured VOC.**

- (2) **When operating any of Presses 260, 261, 262, 273, 268, and 269 in nonheatset mode:**

- (A) **The inks used by that press shall not contain greater than 5.0% VOC content by weight, as applied;**
- (B) **The fountain solution used by that press shall not contain greater than 2.0% VOC content by weight, as applied; and**
- (C) **The solvents used for blanket and roller washes by that press shall comply with at least one (1) of the following:**
 - (i) **The solvent shall not have a vapor pressure greater than 10 mm Hg at 20 degrees C, or**
 - (ii) **The solvent shall not contain greater than 2.5 pounds of VOC per gallon, as applied.**
- (3) The requirements from:
 - (A) CP 107-2726 issued on February 26, 1993, and
 - (B) CP 107-2917 issued on April 6, 1993, conditions #5, #7, #8, and # 9, and
 - (C) CP 107-2478 issued on June 17, 1992, conditions #4, and #5,
 - (D) **Registered Construction and Operation Status letter issued on November 8, 1989,**
 - (E) **Registered Construction and Operation Status letter issued on February 2, 1987, and**
 - (F) **PC (54) 1853, issued on October 20, 1990,**

were removed and have been replaced with new requirements, in order to regulate all thermal oxidizer oxidizers within the entire facility on the same parameters, monitoring and reporting schedule to maintain compliance with 326 IAC 8-1-6 (BACT).

D.3.3 Clean-up Solvent VOC Emissions Control

The VOC flash off for clean-up solvent is 100%. As derived from USEPA's Alternative Control Techniques Document: Offset Lithographic Printing (EPA 453/R-94 054, June 1994), the accepted shop towel retention factor for clean-up solvent is 50%. A 50% reduction in flash off shall be used in VOC emissions formula formulae in D.3.1 as an emission control technique and shall meet the following conditions:

- (a) The clean-up solvent shall have a VOC content of thirty percent (30%) or less, by weight, or a composite vapor pressure less than or equal to ten (10) millimeters of mercury (Hg) at twenty degrees Celsius (20°C); and
- (b) The clean-up solvents shall be kept in tightly covered tanks or containers during transport and storage; and
- (c) The cleaning cloths used with the clean-up solvents shall be placed in tightly closed containers when not in use and while awaiting off-site transport. The cleaning cloths shall be properly cleaned and disposed.

D.3.10 Thermal Oxidizer Oxidizers

- (a) The North Oxidizer shall operate at all times that either of the Presses 268 or 269 are operating **in heatset mode**.
- (b) The South Oxidizer, identified as RTO-1, shall operate at all times that **any of** Presses 260, 261, 262, or 273 are ~~in operation~~ **operating in heatset mode**.
- (c) When operating **the North Oxidizer**, the thermal ~~oxidizer oxidizers~~ shall maintain a minimum operating temperature of:
 - (1) 1350°F, or
 - (2) the temperature and fan amperage or duct velocity determined at the stack tests that achieves a minimum 90% destruction efficiency of the VOC.
- (d) **When operating the South Oxidizer, the thermal oxidizer shall maintain a minimum operating temperature of:**
 - (1) **1350°F, or**
 - (2) **the temperature and fan amperage or duct velocity determined at the stack tests that achieves a minimum 97% destruction efficiency of the VOC.**

D.3.11 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within the range as established in most recent compliant stack test.
- (c) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when~~ **If the reading is outside the above established range for any one reading, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

D.3.12 Particulate Matter Monitoring

- (a) Pursuant to CP 107-2853 daily inspection from the in-line Stainer Press 192 shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while in operation. ~~The Compliance Response Plan for this unit shall be followed whenever~~ **If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.** ~~Failure to take response steps in accordance with Section C - Compliance Response Plan Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.~~

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. During periods of inclement weather, these inspections shall be performed as weather permits. ~~The Compliance Response Plan for this unit shall be followed whenever~~ **If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.**
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

D.3.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1, D.3.2 and D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1, D.3.2 and D.3.3
- (1) The amount and VOC content of each ink, fountain solution, coating material and solvent used. Records shall include purchase orders, invoices, material safety data sheets (MSDS) and other documentation necessary to verify the type and amount used. **Ink usage records shall indicate whether the ink was used in heatset or nonheatset mode.** Solvent usage records shall differentiate between those added to coatings and ink and those used as cleanup solvents;
 - (2) The volume weighted VOC content of the coatings used for each month;
 - (3) The total VOC usage for each month; ~~and~~
 - (4) The weight of VOCs emitted for each compliance period.
 - (5) The VOC content of the used shop towels.
- (b) To document compliance with Condition D.3.12, the Permittee shall maintain a log of weekly overspray observations.
- (c) To document the compliance with Condition D.3.10 and D.3.11, the continuous temperature records for the thermal oxidizers and the temperature used to demonstrate compliance during the most recent compliance stack test and weekly records of the duct pressure or fan amperage.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Furthermore, the facility description in Section D.3 is changed to read as follows:

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

North:

- (5) Two (2) web offset lithographic printing presses, controlled by one (1) 7.6 MMBtu per hour natural gas fired thermal oxidizer ("North Oxidizer") exhausting to one (1) stack identified as SP-5Y(N) in **heatset mode**, including:
 - (a) One (1) Mitsubishi web offset lithographic printing press with two (2) units and two (2) webs identified as Press 268 with a maximum line speed of 1600 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, **exhausting to Vent SP-5AA(N) in nonheatset mode**; and
 - (b) One (1) Toshiba web offset lithographic printing Press with four (4) units and two (2) webs identified as Press 269 with a maximum line speed of 1600 feet per minute and a maximum printing width of 50 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, **exhausting to Vent SP-5BB(N) in nonheatset mode**.
- (6) One (1) Hantscho web offset lithographic printing press with two (2) units and two (2) webs identified as Press 240 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5R(N). The press may operate in either a heatset or nonheatset mode.
- (7) One (1) KBA Compacta web offset lithographic printing press with two (2) units and two (2) webs identified as Press 281 with a maximum line speed of 1100 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5S(N). The press may operate in either a heatset or nonheatset mode.
- (8) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 245 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(N). The press may operate in either a heatset or nonheatset mode.
- (9) One (1) Timson web offset lithographic printing press with one (1) unit and one (1) web identified as Press 242 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Z(N). The press may operate in either a heatset or nonheatset mode.
- (10) One (1) Timson web offset lithographic printing press with one (1) unit and one (1) web identified as Press 243 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5AA(N). The press may operate in either a heatset or nonheatset mode.
- (11) One (1) Harris web offset lithographic printing press with two (2) units and two (2) webs identified as Press 285 with a maximum line speed of 825 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(N). The press may operate in either a heatset or nonheatset mode.
- (12) One (1) Harris web offset lithographic printing press with two (2) units and two (2) webs identified as Press 286 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5L(N). The press may operate in either a heatset or nonheatset mode.

Facility Description [326 IAC 2-7-5(15)]: Printing Presses (Continued)

- (13) One (1) Harris web offset lithographic printing press with four (4) units and two (2) webs identified as Press 287 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(N). The press may operate in either a heatset or nonheatset mode.
- (14) One (1) Harris web offset lithographic printing press with four (4) units and two (2) webs identified as Press 288 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5N(N). The press may operate in either a heatset or nonheatset mode.
- (15) One (1) Harris web offset lithographic printing press with four (4) units and two (2) webs identified as Press 289 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5O(N). The press may operate in either a heatset or nonheatset mode.
- (16) Four (4) UV sheetfed offset lithographic presses:
 - (a) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 232 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.
 - (b) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 233 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.
 - (c) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 238 with a maximum line speed of 434 feet per minute and a maximum printing width of 40 inches including six (6) units and coater, exhausting to one (1) stack SP-5V(N) used as cooling air for UV lamps.
 - (d) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 239 with a maximum line speed of 473 feet per minute and a maximum printing width of 40 inches including two (2) units and coater, exhausting to one (1) stack SP-5W(N) used as cooling air for UV lamps.

South:

- (4) One (1) Mitsubishi web offset lithographic printing press with four (4) units and two (2) webs identified as Press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) **in heatset mode or Vent SP-5N(S) in nonheatset mode.**
- (5) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 270 with a maximum line speed of 807 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to SP-5F(S). The press may operate in either a heatset or nonheatset mode.

Facility Description [326 IAC 2-7-5(15)]: Printing Presses (Continued)

- (6) One (1) Cottrell web offset lithographic printing press with four (4) units and two (2) webs identified as Press 272 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5D(S). The press may operate in either a heatset or nonheatset mode.
- (7) One (1) Mitsubishi web offset lithographic printing press with four (4) units and two (2) webs identified as Press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) **in heatset mode or Vent SP-5L(S) in nonheatset mode.**
- (8) One (1) Cottrell web offset lithographic printing press with four (4) units and two (2) webs identified as Press 276 with a maximum line speed of 1200 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5E(S). The press may operate in either a heatset or nonheatset mode.
- (9) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, and with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) **in heatset mode or Vent SP-5I(S) in nonheatset mode.** The press may operate in either a heatset or nonheatset mode.
- (10) One (1) Toshiba web offset lithographic printing press with four (4) units and one (1) web identified as Press 261 with a maximum line speed of 1500 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment. The press may operate in either a heatset or nonheatset mode, with VOC emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-1, rated at 1.7 million British thermal units per hour, exhausting to Stack SP-5T(S) **in heatset mode or Vent SP-5J(S) in nonheatset mode.**
- (11) One (1) Hantscho web offset lithographic printing press with one (1) unit and one (1) web identified as Press 290 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5G(S). The press may operate in either a heatset or nonheatset mode.
- (12) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 291 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5H(S). The press may operate in either a heatset or nonheatset mode.
- (13) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 293 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(S). The press may operate in either a heatset or nonheatset mode.
- (14) One (1) Hantscho web offset lithographic printing press with four (4) units and two (2) webs identified as Press 294 with a maximum line speed of 1076 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(S). The press may operate in either a heatset or nonheatset mode.

Facility Description [326 IAC 2-7-5(15)]: Printing Presses (continued)

- (15) One (1) Hantscho web offset lithographic printing press with two (2) units and two (2) webs identified as Press 295 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5P(S). The press may operate in either a heatset or nonheatset mode.
- (16) One (1) Harris web offset lithographic printing press with two (2) units and two (2) webs identified as Press 296 with a maximum line speed of 860 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(S). The press may operate in either a heatset or nonheatset mode.
- (17) One (1) Heidelberg sheetfed offset lithographic press identified as Press 258 with a maximum line speed of 505 feet per minute and a maximum printing width of 40.5 inches including six (6) units and coater, exhausting to one (1) stack SP-5R(S) used as cooling air for electric heaters.
- (18) One (1) In-line Stainer 192 used for edge staining paper using low pressure-high volume spray coating and using dry filters for overspray control and exhausting through stack BS-4X(S).
- (19) One (1) nonheatset, sheet-fed, offset lithographic printing press, identified as Press 250, constructed in 2006, exhausting to stack SP-5U(s), capacity: 13,000 sheets (14.56 million square inches) per hour.

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

Also, two quarterly report forms are changed to read as follows:

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

Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company
 Source Address: 1009 Sloan Street, Crawfordsville, Indiana IN 47933-2744 **2743**
 Mailing Address: 1009 Sloan Street, Crawfordsville, Indiana IN 47933-2744 **2743**
 Part 70 Permit No.: T107-5963-00052
 Facilities: (per press) Press 240, Press 281, Press 245, Press 289, ~~Press 260, Press 261,~~ Press 290,
 Press 291, Press 293, ~~Press 273,~~ Press 294, Press 295, Press 296, Press 258, Press 238,
 Press 239, and
 Press 232 and Press 233 (combined)
 Parameter: VOC
 Limit: The VOC content delivered to the applicator of the press shall be limited such that VOC
 emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore,
 the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities:
 General Reduction Requirements) does not apply. VOC emitted will be based on the following
 equation:

VOC emissions (tpy) =
 (ink usage in **heatset mode** * volatile content * 80% flash off) +
 (ink usage in **nonheatset mode** * volatile content * 5% flash off) +
 (fountain solution usage * volatile content * 100% flash off) +
 (manual cleaner usage * volatile content * 50% flash off) +
 (automatic cleaner usage * volatile content * 100% flash off)

Press: _____ Year: _____

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on:

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

A certification is required for this report.

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

Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company
 Source Address: 1009 Sloan Street, Crawfordsville, Indiana IN 47933-2744 **2743**
 Mailing Address: 1009 Sloan Street, Crawfordsville, Indiana IN 47933-2744 **2743**
 Part 70 Permit No.: T107-5963-00052
 Facility: ~~Presses~~ Press 242 and Press 243
 Parameter: VOC
 Limit: VOC input usage shall be not exceed a combined 39 tons per year, based on 80% VOC flash-off during web heatset ink usage **and 5% VOC flash-off during web nonheatset ink usage**, calculated on a 12 month rolling monthly average. The total amount of VOC delivered to each press individually, including clean-up solvents, shall not exceed 25 tons per year, per press, based on 80% VOC flash-off during web heatset ink usage **and 5% VOC flash-off during web nonheatset ink usage**, calculated on a 12 month rolling monthly average. (Assuming 100% VOC flash off for fountain solution and 50% VOC flash off for cleaner usage)

YEAR: _____

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 107-23347-00052. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: R. R. Donnelley & Sons Company
Address City IN Zip: 1009 Sloan Street, Crawfordsville, IN 47933
Permit Number: 107-23347-00052
Reviewer: Allen R. Davidson
Date: 8/7/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin2/year
260	1615	36	366701

INK VOCS					
Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Organics*	Flash Off %	Throughput (MMin2/year)	Emissions (tons/year)
Lithographic Ink	0.25	29.4%	5%	366701	0.67
Fountain Solution (as supplied)	0.025	5.8%	100%	366701	0.27
Manual Cleaning Solvent	0.01	100.0%	50%	366701	0.92
Automatic Cleaning Solvent	0.01	2.0%	100%	366701	0.04

Total VOC Emissions =	1.89 Ton/yr
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*VOC (Tons/year) = Maximum Coverage pounds per MMin² * Weight % organics (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin²per Year
 VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: R. R. Donnelley & Sons Company
Address City IN Zip: 1009 Sloan Street, Crawfordsville, IN 47933
Permit Number: 107-23347-00052
Reviewer: Allen R. Davidson
Date: 8/7/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin2/year
261	1500	36	340589

INK VOCS					
Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Organics*	Flash Off %	Throughput (MMin2/year)	Emissions (tons/year)
Lithographic Ink	0.25	29.4%	5%	340589	0.63
Fountain Solution (as supplied)	0.025	5.8%	100%	340589	0.25
Manual Cleaning Solvent	0.01	100.0%	50%	340589	0.85
Automatic Cleaning Solvent	0.01	2.0%	100%	340589	0.03

Total VOC Emissions =	1.76 Ton/yr
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*VOC (Tons/year) = Maximum Coverage pounds per MMin² * Weight % organics (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin²per Year
 VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: R. R. Donnelley & Sons Company
Address City IN Zip: 1009 Sloan Street, Crawfordsville, IN 47933
Permit Number: 107-23347-00052
Reviewer: Allen R. Davidson
Date: 8/7/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin2/year
262	1708	61	657135

INK VOCS					
Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Organics*	Flash Off %	Throughput (MMin2/year)	Emissions (tons/year)
Lithographic Ink	0.25	29.4%	5%	657135	1.21
Fountain Solution (as supplied)	0.025	5.8%	100%	657135	0.48
Manual Cleaning Solvent	0.01	100.0%	50%	657135	1.64
Automatic Cleaning Solvent	0.01	2.0%	100%	657135	0.07

Total VOC Emissions =	3.39 Ton/yr
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*VOC (Tons/year) = Maximum Coverage pounds per MMin² * Weight % organics (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year
 VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: R. R. Donnelley & Sons Company
Address City IN Zip: 1009 Sloan Street, Crawfordsville, IN 47933
Permit Number: 107-23347-00052
Reviewer: Allen R. Davidson
Date: 8/7/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin2/year
273	1615	64	651912

INK VOCS					
Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Organics*	Flash Off %	Throughput (MMin2/year)	Emissions (tons/year)
Lithographic Ink	0.25	29.4%	5%	651912	1.20
Fountain Solution (as supplied)	0.025	5.8%	100%	651912	0.47
Manual Cleaning Solvent	0.01	100.0%	50%	651912	1.63

Total VOC Emissions =	3.30 Ton/yr
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*VOC (Tons/year) = Maximum Coverage pounds per MMin² * Weight % organics (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year
 VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: R. R. Donnelley & Sons Company
Address City IN Zip: 1009 Sloan Street, Crawfordsville, IN 47933
Permit Number: 107-23347-00052
Reviewer: Allen R. Davidson
Date: 8/7/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin2/year
268	1600	64	645857

INK VOCS					
Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Organics*	Flash Off %	Throughput (MMin2/year)	Emissions (tons/year)
Lithographic Ink	0.25	29.4%	5%	645857	1.19
Fountain Solution (as supplied)	0.025	9.0%	100%	645857	0.73
Manual Cleaning Solvent	0.01	100.0%	50%	645857	1.61
Automatic Cleaning Solvent	0.0002	2.0%	100%	645857	0.00

Total VOC Emissions =	3.53 Ton/yr
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*VOC (Tons/year) = Maximum Coverage pounds per MMin² * Weight % organics (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year
 VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: R. R. Donnelley & Sons Company
Address City IN Zip: 1009 Sloan Street, Crawfordsville, IN 47933
Permit Number: 107-23347-00052
Reviewer: Allen R. Davidson
Date: 8/7/2006

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin2/year
269	1600	50	504576

INK VOCS					
Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Organics*	Flash Off %	Throughput (MMin2/year)	Emissions (tons/year)
Lithographic Ink	0.25	29.4%	5%	504576	0.93
Fountain Solution (as supplied)	0.025	9.0%	100%	504576	0.57
Manual Cleaning Solvent	0.01	100.0%	50%	504576	1.26
Automatic Cleaning Solvent	0.0002	2.0%	100%	504576	0.00

Total VOC Emissions =	2.76 Ton/yr
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*VOC (Tons/year) = Maximum Coverage pounds per MMin² * Weight % organics (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin²per Year
 VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

Appendix A: Emissions Calculations

Company Name: R. R. Donnelley & Sons Company
Address City IN Zip: 1009 Sloan Street, Crawfordsville, IN 47933
Permit Number: 107-23347-00052
Reviewer: Allen R. Davidson
Date: 8/7/2006

Equivalent limits for fountain solution:

$$\frac{2.5 \text{ lb VOC/gal}}{8.5 \text{ lb/gal}} = 29.41\% \text{ VOC}$$

Equivalent limits for inks:

$$\frac{2.5 \text{ lb VOC}^* \text{ gal}^*}{\text{gallon} \quad 3.7854 \text{ liter}} = \frac{453.59 \text{ g}}{\text{lb}} = \frac{299.57 \text{ g}}{\text{l}}$$

$$5\% \text{ VOC}^* \quad 8.26 \text{ lb/gal} = 0.413 \text{ lb VOC/gal}$$

$$\frac{0.413 \text{ lb VOC}^* \text{ gal}^*}{\text{gallon} \quad 3.7854 \text{ liter}} = \frac{453.59 \text{ g}}{\text{lb}} = \frac{49.49 \text{ g}}{\text{l}}$$

$$5\% \text{ VOC}^* \quad 8.75 \text{ lb/gal} = 0.4375 \text{ lb VOC/gal}$$

$$\frac{0.4375 \text{ lb VOC}^* \text{ gal}^*}{\text{gallon} \quad 3.7854 \text{ liter}} = \frac{453.59 \text{ g}}{\text{lb}} = \frac{52.42 \text{ g}}{\text{l}}$$

$$5\% \text{ VOC}^* \quad 8.9 \text{ lb/gal} = 0.445 \text{ lb VOC/gal}$$

$$\frac{0.445 \text{ lb VOC}^* \text{ gal}^*}{\text{gallon} \quad 3.7854 \text{ liter}} = \frac{453.59 \text{ g}}{\text{lb}} = \frac{53.32 \text{ g}}{\text{l}}$$