



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53 IGCN 1003
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: June 29, 2007
RE: Maggie's Farm dba doodad / 011-24345-00026
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06



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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Indianapolis, Indiana 46204-2251
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June 29, 2007

Mr. Mark P. Gebler
Maggie's Farm dba doodad
720 Ransdell Road
Lebanon, Indiana 46052

Re: 011-24345-00026
Significant Permit Revision to
FESOP 011-18412-00026

Dear Mr. Gebler:

Maggie's Farm dba doodad was issued Federally Enforceable State Operating Permit (FESOP) No. 011-18412-00026 on November 23, 2004 for a stationary heatset web offset printing press operation. On March 2, 2007, the source submitted a letter requesting a change in source name and the construction and operation of a new 0.54 MMBtu per hour catalytic oxidizer (identified as catalytic oxidizer #1R) to control VOC emissions from Press #1. This new 0.54 MMBtu per hour catalytic oxidizer will replace the existing catalytic oxidizer (identified as catalytic oxidizer #1) rated at 0.54 MMBtu per hour. The manufacturer of the new catalytic oxidizer certifies that this device will achieve 95% VOC destruction efficiency at an air flow rate of 1,440 actual cubic feet per minute (acfm). The new catalytic oxidizer (#1R) is similar to control devices already permitted.

IDEM, OAQ has determined that the Permittee will be required to perform stack testing within 180 days of startup of the new catalytic oxidizer #1R to demonstrate that the VOC emissions from Press #1 are in compliance with the requirements of 326 IAC 2-8-4 and 326 IAC 8-1-6. Pursuant to the provisions of 326 IAC 2-8-11.1(g)(1), a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Stephen Treimel, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7902 to speak directly to Mr. Treimel. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027, and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original document signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments
ERG/ST

cc: File – Boone County
U.S. EPA, Region V
Boone County Health Department
Air Compliance Section Inspector - Dave Rice
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner
Billing, Licensing and Training - Dan Stamatkin



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

**Maggie's Farm dba doodad
720 Ransdell Road,
Lebanon, IN 46052**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

Operation Permit No.: F011-18412-00026	
Original Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 23, 2004 Expiration Date: November 23, 2009
First Administrative Amendment 011-21248-00026, issued on June 29, 2005	
Significant Permit Revision: 011-24345-00026	Pages Affected: Entire Permit
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 29, 2007 Expiration Date: November 23, 2009

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SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary heatset web offset printing press operation.

Source Address:	720 Ransdell Road, Lebanon, IN 46052
Mailing Address:	720 Ransdell Road, P.O. Box 772, Lebanon, IN 46052
General Source Phone:	(765) 485-2778
SIC Code:	2752
Source Location Status:	Boone
	Nonattainment for ozone under the 8-hour standard
	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD and Emission Offset Rules;
	and Nonattainment NSR

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

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

- (a) One (1) heat set half web press and dryer, identified as Press #1, with a maximum line speed of 1,260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #1R, as control, and exhausting at one (1) stack, identified as stack 1.
- (b) One (1) heat set web press and dryer, identified as Press #2, with a maximum line speed of 1,260 feet per minute and a maximum print width of 38 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #2, as control, and exhausting at one (1) stack, identified as stack 2.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour.
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

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

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

SECTION B

GENERAL CONDITIONS

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

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

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

- (a) This permit (F011-18412-00026) 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 until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), 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.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) All terms and conditions of 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.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, 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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

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

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

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

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

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

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

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

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

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

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-3]

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) heat set half web press and dryer, identified as Press #1, with a maximum line speed of 1,260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #1R, as control, and exhausting at one (1) stack, identified as stack 1.
- (b) One (1) heat set web press and dryer, identified as Press #2, with a maximum line speed of 1,260 feet per minute and a maximum print width of 38 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #2, as control, and exhausting at one (1) stack, identified as stack 2.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The total volatile organic compounds (VOC) input to the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2) shall be limited such that its controlled VOC emissions will be less than 100 tons per twelve (12) consecutive months period, with compliance determined at the end of each month, based on 80% flash off and:

- (a) 95% overall VOC control efficiency by the catalytic oxidizer, identified as #2, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) web press and dryer, (ID Press #2), and
- (b) 68% overall VOC control efficiency by the catalytic oxidizer, identified as #1R, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) half web press and dryer, (ID Press #1).

Compliance with these limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.2 New Facilities; General Reduction Requirements for Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 which requires use of BACT, CP 011-2057-00026 issued on January 6, 1993 and FESOP No. 011-11070-00026 issued on October 6, 1999 the two (2) natural gas fired catalytic oxidizers identified as catalytic oxidizer #1R and #2, respectively, shall operate with a minimum temperature of 650° F and 550° F, respectively, or a temperature established during the latest stack test, and:

- (a) The catalytic oxidizer #2 shall have a capture efficiency of 100% and a control efficiency of 95%.
- (b) The catalytic oxidizer #1R shall have a capture efficiency of at least 75% combined with destruction efficiency of 95% that will ensure an overall control efficiency of at least 68%.

The minimum temperature rates are permit limits requiring certification in accordance with General Condition B.11.

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

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

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

D.1.5 Volatile Organic Compound Control

- (a) The capture system and the catalytic oxidizer, identified as catalytic oxidizer #1R, shall be in operation at all times when the printing press, identified as Press #1, is in operation.
- (b) The capture system and the catalytic oxidizer, identified as catalytic oxidizer #2, shall be in operation at all times when the printing press, identified as Press #2, is in operation.

D.1.6 VOC and HAP Emissions

- (a) Compliance with Condition D.1.1 shall be demonstrated within thirty (30) days of the end of each month based on the total volatile organic compound (VOC) usage for the most recent twelve (12) month period.
- (b) Compliance with Condition D.1.1 shall be determined using the following equation for VOC emission: $\text{VOC emission} = [(\text{VOC input}) \times \text{control efficiency} \times \text{flash-off factor (80\%)}]$

Compliance Monitoring Requirements

D.1.7 Catalytic Oxidizer Temperature and Air Flow Rate

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the two (2) catalytic oxidizers, identified as #1R and #2 used in conjunction with one (1) half web press and dryer, (ID Press #1) and one (1) web press and dryer (ID Press #2) for measuring operating temperature and air flow rate. The output of the temperature monitoring 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 the catalytic oxidizers (burners) #1R and #2 at or above the 3-hour average temperature of 650°F and 550°F, respectively, and the minimum air flow rate shall be maintained at 1,440 acfm and 3,240 acfm, respectively. From the date of issuance of this permit until the new catalytic oxidizer #1R is in operation, the minimum air flow rate for the existing catalytic oxidizer #1 shall be maintained at 3,410 acfm.
- (b) The Permittee shall determine the 3-hour average temperature and the appropriate air flow rates from the most recent valid stack tests that demonstrate compliance with limits in conditions D.1.1 and D.1.2, as approved by IDEM.
- (c) On and after the date the approved stack tests results are available, the Permittee shall operate the catalytic oxidizers at or above the hourly average temperature and the minimum air flow rate as observed during the compliant stack tests.

D.1.8 Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack tests that demonstrate compliance with limits in conditions D.1.1 and D.1.2, as approved by IDEM.

- (b) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizers are 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 tests.

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

D.1.9 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

- (a) The Permittee shall perform VOC testing on one (1) web press and dryer, (ID Press #2) and one (1) half web press and dryer, (ID Press #1) utilizing Methods 25 or 25A (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner within sixty (60) days of the issuance date of this permit. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.
- (b) In order to determine compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform VOC testing on Press #1 and the catalytic oxidizer (#1R), utilizing Methods 25 or 25A (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner within 180 days of startup of operations of the catalytic oxidizer (#1R). This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly or as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit established in Conditions D.1.1 and D.1.6.
- (1) The quantity of VOC containing material used, including purchase orders, invoices, material safety data sheets (MSDS) or other supplier documentation necessary to verify the type and amount used;
 - (2) The VOC content of each coating material and solvent used;
 - (3) The weight of VOCs emitted for each compliance period, considering capture and control efficiencies; and
 - (4) The following operation parameters of each catalytic oxidizer:
 - (A) VOC capture efficiency;
 - (B) VOC destruction efficiency of the control device;
 - (C) A description of the data used to establish the capture and destruction efficiencies; and
 - (D) Continuous temperature readings.
 - (5) Continuous air flow rate readings.

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain continuous records of the combustion chamber temperature (on a 3-hour average basis) and air flow rates of the two (2) catalytic oxidizers, identified as #1R and #2 used in conjunction with the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2), when the heatset web offset printing presses are in operation and venting to the atmosphere.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain daily records of the duct pressure or fan amperage of the two (2) catalytic oxidizers, identified as #1R and #2. The Permittee shall include in its daily record when a duct pressure or fan amperage reading is not taken and the reason for the lack of a duct pressure or fan amperage reading (e.g. the process did not operate that day).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Maggie's Farm dba doodad
Source Address: 720 Ransdell Road, Lebanon, IN 46052
Mailing Address: 720 Ransdell Road, P.O. Box 772, Lebanon, IN 46052
FESOP No.: F011-18412-00026

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Maggie's Farm dba doodad
Source Address: 720 Ransdell Road, Lebanon, IN 46052
Mailing Address: 720 Ransdell Road, P.O. Box 772, Lebanon, IN 46052
FESOP No.: F011-18412-00026

This form consists of 2 pages Page 1 of 2

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Maggie's Farm dba doodad
Source Address: 720 Ransdell Road, Lebanon, IN 46052
Mailing Address: 720 Ransdell Road, P.O. Box 772, Lebanon, IN 46052
FESOP No.: F011-18412-00026
Facility: Heatset Web Offset Printing Press Operation
Parameter: VOC Emissions
Limit: Controlled VOC emissions will be less than 100 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, based on 80% flash off and:
(a) 95% overall VOC control efficiency by the catalytic oxidizer, identified as #2, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) web press and dryer, (ID Press #2).
(b) 68% overall VOC control efficiency by the catalytic oxidizer, identified as #1R, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) half web press and dryer, (ID Press #1).

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Maggie's Farm dba doodad
Source Address: 720 Ransdell Road, Lebanon, IN 46052
Mailing Address: 720 Ransdell Road, P.O. Box 772, Lebanon, IN 46052
FESOP No.: F011-18412-00026

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
Permit Requirement (specify permit condition #)	Condition D.1.7
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**

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

Source Background and Description

Source Name:	Maggie's Farm dba doodad
Source Location:	720 Ransdell Road, Lebanon, IN 46052
County:	Boone
SIC Code:	2752
Significant Permit Revision No.:	011-24345-00026
Permit Reviewer:	ERG/ST

On April 18, 2007, the Office of Air Quality (OAQ) had a notice published in the Lebanon Reporter, Lebanon, Indiana, stating that Maggie's Farm dba doodad had applied for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) to operate a stationary heatset web offset printing press operation with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified, if applicable, to reflect these changes.

1. The phone number and facsimile number for IDEM has been updated and the specific mail codes (MC) for each of the IDEM branches have been added to improve mail delivery, as follows:

Telephone Number: ~~317-233-5674~~ **317-233-0178**
Facsimile Number: ~~317-233-5967~~ **317-233-6865**

Permits Branch: **MC 61-53 IGCN 1003**
Compliance Branch: **MC 61-53 IGCN 1003**
Asbestos Section: **MC 61-52 IGCN 1003**
Technical Support and Modeling: **MC 61-50 IGCN 1003**

2. IDEM has moved Condition B.1 (Permit No Defense) to the cover page of the permit as follows:

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

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

~~Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not~~

~~alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.~~

3. IDEM has moved Condition A.5 to the B Section and moved the B section condition Termination of Right to Operate to clarify the intent of these conditions.

~~A.5~~ **B.13** Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

~~B.5~~ **B.14** Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

4. IDEM has revised Condition B.2 (formerly B.3) and added Condition B.3 (Term of Conditions) to clarify the intent:

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

- (a) This permit (**F011-18412-00026**) 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 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.**
5. Upon further review, IDEM has decided to remove paragraph (d) concerning nonroad engines from Condition B.18 (formerly B.17) Permit Amendment or Revision. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new.

~~B.17~~ **B.18** Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

...

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

6. IDEM has made the following changes to conditions in Sections B and C to correct typographical errors and to clarify the intent.

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by ~~the~~ **an** "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. ~~When~~ **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.14~~ **B.10** Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

...

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

~~B.12~~ **B.11** Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

...

- (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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by ~~the~~ **an** "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

~~B.13~~ **B.12** Emergency Provisions [326 IAC 2-8-12]

...

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that ~~describes~~ **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 ~~No.~~ **Number:** 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone ~~No.~~ **Number:** 317-233-~~5674~~ **0178** (ask for Compliance Section)
Facsimile ~~No.~~ **Number:** 317-233-~~5967~~ **6865**

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

...

B.14 B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) ...

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

...

~~B.15~~ **B.16** Permit Modification, Reopening, Revocation and Reissuance, or Termination

~~[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]~~

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a ~~FESOP~~ **Federally Enforceable State Operating Permit** modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. ~~[326 IAC 2-8-4(5)(C)]~~ The notification by the Permittee does require the certification by ~~the an~~ "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

~~B.16~~ **B.17** Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

- (c) ~~Right to Operate After Application for Renewal [326 IAC 2-8-9]~~

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as **being** needed to process the application.

B.17 B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

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

B.18 B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at ~~this~~ **the** source that are described in 326 IAC 2-8-15(b) through (d), without a prior permit revision, if each of the following conditions is met:

...

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

...

B.19 B.20 ~~Permit Revision~~ **Source Modification** Requirement [326 IAC 2-8-11.1]

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

B.20 B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] ~~[IC 13-17-3-2]~~
[IC13-30-3-1]

- ...

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

B.24 B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- ...

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit

responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

...

~~B.22~~ **B.23** Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

...

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 **4230**(ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (1) ~~Pursuant to 40 CFR 52 Subpart P, particulate matter emissions 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.~~
- (2) ~~Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.~~

C.2 Overall Source Limit [326 IAC 2-8] **[326 IAC 2-2] [326 IAC 2-3]**

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also ~~satisfy~~ **render** the requirements of **326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;**
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) ~~Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)),~~ **The** potential to emit particulate matter (PM) from the entire source shall be limited to less than two

hundred fifty (250) tons per twelve (12) consecutive month period. **This limitation shall also render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.**

...

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

7. IDEM has determined to remove Condition C.7 - Operation of Equipment because the requirements in this condition have been included in Section D. Subsequent conditions in Section C have been re-numbered accordingly.

~~C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]~~

~~Except as otherwise provided by statute, 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 unit vented to the control equipment is in operation.~~

8. IDEM has made the following changes to conditions in Section C to correct typographical errors and to clarify the intent.

G.8 C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

...

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

All required notifications shall be submitted to:

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

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

...

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

G.9 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, 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~~ **an** "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by ~~the~~ **an** "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

C.12 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.14 C.13 ~~Compliance Response Plan – Preparation, Implementation, Records, and Reports~~
Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- ~~(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 is 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 is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

- ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~
- ~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~
- ~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~
- ~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
- ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment 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 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:**
- (1) initial inspection and evaluation;**
- (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**

- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

~~C.15~~ **C.14** Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

...

- (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.

...

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

~~C.17~~ **C.16** General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

...

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

...

9. Upon further review, IDEM has decided to modify Condition D.1.2, which specifies the BACT requirements for the replacement catalytic oxidizer (#1R) on Press #1. The BACT for Press #1 and Press #2, as specified in CP 011-2057-00026, issued January 6, 1993 and amended on April 22, 1993, and in FESOP 011-18412-00026, issued on November 23, 2004, requires that VOC emissions be captured and controlled to achieve specified overall control efficiencies. The minimum air flow requirements are not a specific condition of the BACT, but are established during the compliant stack test. Therefore, the minimum air flow requirements for the existing catalytic oxidizers #1 and #2, as well as the new catalytic oxidizer #1R, have been moved to the Compliance Monitoring section of the permit (Condition D.1.7).

The new catalytic oxidizer #1R is designed at a lower flow rate than that of the catalytic oxidizer it is replacing (catalytic oxidizer #1). Therefore, in condition D.1.7, the minimum air flow rate for the existing catalytic oxidizer #1 has been added back to the permit at the value in FESOP 011-18412-00026. This will enable the permittee to maintain compliance with the operating parameters for the existing catalytic oxidizer until it is replaced. The permit has been changed as follows:

D.1.2 New Facilities; General Reduction Requirements for Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 which requires use of BACT, CP 011-2057-00026 issued on January 6, 1993 and FESOP No. 011-11070-00026 issued on October 6, 1999 the two (2) natural gas fired catalytic oxidizers identified as catalytic oxidizer #1R and #2, respectively, shall operate with a minimum temperature of 650° F and 550° F, respectively, or a temperature established during the latest stack test, ~~and the minimum air flow rate shall be maintained at 1,440 acfm and 3,240 acfm, respectively, or an air flow rate established during the latest stack test.~~ **and:**

- (a) The catalytic oxidizer #2 shall have a capture efficiency of 100% and a control efficiency of 95%.
- (b) The catalytic oxidizer #1R shall have a capture efficiency of at least 75% combined with destruction efficiency of 95% that will ensure an overall control efficiency of at least 68%.

The minimum temperature ~~and air flow~~ rates are permit limits requiring certification in accordance with General Condition B.11. ~~Operation at or above the minimum temperature and air flow ensures compliance with the BACT requirements of 326 IAC 8-1-6.~~

D.1.7 Catalytic Oxidizer Temperature and Air Flow Rate

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the two (2) catalytic oxidizers, identified as #1R and #2 used in conjunction with one (1) half web press and dryer, (ID Press #1) and one (1) web press and dryer (ID Press #2) for measuring operating temperature and air flow rate. The output of the temperature monitoring 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 the catalytic oxidizers (burners) #1R and #2 at or above the 3-hour average temperature of 650°F and 550°F, respectively, and the minimum air flow rate shall be maintained at 1,440 acfm and 3,240 acfm, respectively. **From the date of issuance of this permit until the new catalytic oxidizer #1R is in operation, the minimum air flow rate for the existing catalytic oxidizer #1 shall be maintained at 3,410 acfm.**

...

10. The language in Conditions D.1.4, D.1.5, and D.1.6 has been modified to clarify the intent of these conditions. For Condition D.1.5, the respective capture and control systems must operate when the printing line they control is in operation.

D.1.4 Volatile Organic Compounds (VOC)

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

D.1.5 Volatile Organic Compound Control

- (a) The capture system and the ~~two (2)~~ catalytic oxidizers, identified as catalytic oxidizer #1R and #2, shall be in operation at all times when the ~~two (2)~~ printing presses, **identified as (Press #1, and #2) are is** in operation.
- (b) **The capture system and the catalytic oxidizer, identified as catalytic oxidizer #2, shall be in operation at all times when the printing press, identified as Press #2, is in operation.**

D.1.6 VOC and HAP Emissions

- (a) Compliance with Condition D.1.1 shall be demonstrated within thirty (30) days of the end of each month based on the total volatile organic compound (VOC) usage for the most recent twelve (12) month period.
- (b) Compliance with Condition D.1.1 shall be determined using the following equation for VOC ~~usage~~ **emission**: $\text{VOC usage emission} = [(\text{VOC input}) \times \text{control efficiency} \times \text{flash-off factor (80\%)}]$

11. The language in Condition D.1.10 has been modified to clarify the intent of this condition.

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly or as stated below and shall be complete and sufficient to establish compliance with the ~~VOC usage limits and/or the VOC emission limits~~ established in Conditions D.1.1 and D.1.6.
- ...
- ~~(b)~~ To document compliance with Condition D.1.3, the Permittee shall maintain ~~of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~(e)~~(b) To document compliance with Condition D.1.7, the Permittee shall maintain continuous records of the combustion chamber temperature (on a 3-hour average basis) and air flow rates of the two (2) catalytic oxidizers, identified as #1R and #2 used in conjunction with the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2), when the heatset web offset printing presses are in operation and venting to the atmosphere.
- ~~(d)~~(c) To document compliance with Condition D.1.8, the Permittee shall maintain daily records of the duct pressure or fan amperage of the two (2) catalytic oxidizers, identified as #1R and #2. **The Permittee shall include in its daily record when a duct pressure or fan amperage reading is not taken and the reason for the lack of a duct pressure or fan amperage reading (e.g. the process did not operate that day).**
- ~~(e)~~(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

12. The FESOP Quarterly Reporting Form has been revised to clarify the intent.

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

FESOP Quarterly Report

Source Name: Maggie's Farm dba doodad
 Source Address: 720 Ransdell Road, Lebanon, IN 46052
 Mailing Address: 720 Ransdell Road, P.O. Box 772, Lebanon, IN 46052
 FESOP No.: F011-18412-00026
 Facility: Heatset Web Offset Printing Press Operation
 Parameter: **VOC Emissions**
 Limit: Controlled VOC emissions will be less than 100 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, based on 80% flash off and:

- (a) 95% overall VOC control efficiency by the catalytic oxidizer, identified as #2, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) web press and dryer, (ID Press #2).
- (b) 68% overall VOC control efficiency by the catalytic oxidizer, identified as #1R, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) half web press and dryer, (ID Press #1).

YEAR: _____

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

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

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

Source Background and Description

Source Name:	Maggie's Farm dba doodad
Source Location:	720 Ransdell Road, Lebanon, IN 46052
County:	Boone
SIC Code:	2752
Operation Permit No.:	F011-18412-00026
Operation Permit Issuance Date:	November 23, 2004
Significant Permit Revision No.:	011-24345-00026
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a revision application from Maggie's Farm dba doodad relating to the operation of a stationary heatset web offset printing press operation.

History

Maggie's Farm dba doodad was issued Federally Enforceable State Operating Permit (FESOP) 011-18412-00026 on November 23, 2004 for a stationary source for the operation of a heatset web offset printing press operation. On March 2, 2007, the source submitted a letter requesting a change in source name and the construction and operation of a new 0.54 MMBtu per hour catalytic oxidizer (identified as catalytic oxidizer #1R) to control VOC emissions from Press #1.

Existing Approvals

The source was issued a FESOP F011-18412-00026 on November 23, 2004. The source has since received the following:

- (a) First Administrative Amendment 011-21248-00026, issued on June 29, 2005.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An application for the purposes of this review was received on February 2, 2007.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (page 1).

Potential To Emit of the Revision

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

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

Pollutant	Potential To Emit (tons/year)
PM	4.4E-3
PM-10	0.02
SO ₂	1.4E-3
VOC	0.01
CO	0.19
NO _x	0.23
HAPs	4.4E-3

Note: For the purpose of determining Title V applicability for particulates, PM10, not PM, is the regulated pollutant in consideration.

Justification for Revision

The FESOP is being modified through a FESOP Significant Permit Revision. The new 0.54 MMBtu per hour catalytic oxidizer will replace the existing catalytic oxidizer (identified as catalytic oxidizer #1) rated at 0.54 MMBtu per hour. IDEM, OAQ has determined that the Permittee will be required to perform stack testing within 180 days of startup of the new catalytic oxidizer #1R to demonstrate that the VOC emissions from Press #1 are in compliance with the requirements of 326 IAC 2-8-4 and 326 IAC 8-1-6. This revision is being performed pursuant to 326 IAC 2-8-11.1(g)(1), because this modification triggers a new applicable requirement (stack testing) for the existing emissions unit identified as Press #1 and its new catalytic oxidizer.

Potential to Emit after Revision

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

Process/facility	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC*	CO	NO _x	HAPs
Press #1	0.004	0.02	0.01	11.2	0.19	0.23	0.09
Press #2	0.004	0.02	0.01	21.3	0.19	0.23	
Insignificant Activities	0.05	0.05	0.02	0.03	0.52	0.61	0.01
Total Emissions	0.06	0.09	0.04	32.8	0.9	1.07	0.1

* VOC emissions from Press #1 and #2 are controlled by Catalytic Oxidizers #1R and #2, respectively to comply with 326 IAC 2-8 (FESOP).

After the addition of the catalytic oxidizer #1R, the potential to emit of the criteria pollutants from the entire source is still less than the Title V major source thresholds. Therefore, the requirements of 326 IAC 2-7 are not applicable to this source.

County Attainment Status

The source is located in Boone County.

Pollutant	Status
PM-10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana. Effective October 25, 2006, 326 IAC 1-4-1 has been revised revoking the one hour ozone standard in Indiana.

- (a) Boone County has been classified as unclassifiable or attainment for PM2.5. 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 PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Boone County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (c) Boone County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emissions
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this permit revision.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this permit revision.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Boone County and the source is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Additionally, the source has no lead emissions. Therefore, 326 IAC 2-6 does not apply.

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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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 - Individual Facilities

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

Pursuant to CP 011-2057-00026, issued on January 6, 1993, the VOC emissions from Press #1 are required to be controlled by a catalytic oxidizer with a capture efficiency of at least 75% and a destruction efficiency of 95%, for an overall control efficiency of at least 68%. The manufacturer of the new catalytic oxidizer certifies that the oxidizer will meet the 95% VOC destruction requirement at an air flow rate of 1,440 acfm. The replacement of the existing oxidizer (#1) with a new oxidizer (#1R) satisfies the BACT requirements for Press #1 and the catalytic oxidizer. This requirement of 95% destruction efficiency and 68% overall control efficiency shall be verified by stack testing. Proper operation of the capture system and catalytic incinerator, as verified by satisfaction of this condition, shall constitute Best Available Control Technology for this press and shall be deemed to satisfy the requirements of CP 011-2057-00026 and 326 IAC 8-1-6.

Testing Requirements

This source is subject to 326 IAC 2-1.1-11 and 326 IAC 8-1-6 and shall perform VOC testing on Press #1, controlled by a catalytic oxidizer (#1R) within 180 days of startup of the catalytic oxidizer (#1R) utilizing Methods 25 or 25A (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance testing. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous

compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this revision are as follows:

- (a) The one (1) half web press and dryer, (ID Press #1) has applicable compliance monitoring conditions as specified below:

The Permittee shall record the combustion chamber temperature of the catalytic oxidizer (#1R) used in conjunction with the web press and dryer, (Press #1) at least once daily when the heatset web offset printing press is in operation when venting to the atmosphere. Unless operated under conditions for which the Preventative Maintenance Plan specifies otherwise, the combustion chamber of the catalytic oxidizer #1R and #2, shall be maintained at a minimum temperature of 650° F or a temperature established during the latest stack test, and the minimum air flow rate shall be maintained at 1,440 acfm, or an air flow rate established during the latest stack test. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is lower than then above mentioned.

These monitoring conditions are necessary because the catalytic oxidizer for the web press and dryer, (Press #1) must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

Proposed Changes

The changes listed below have been made to Federally Enforceable State Operating Permit No. Part 70 Operating Permit No. 011-18412-00026. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Maggie's Farm LLC dba doodad
720 Ransdell Road,
Lebanon, IN 46052

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

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

- (a) One (1) heat set half web press and dryer, identified as Press #1, with a maximum line speed of 1,260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #1R, as control, and exhausting at one (1) stack, identified as stack 1.

...

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) heat set half web press and dryer, identified as Press #1, with a maximum line speed of 1,260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as catalytic oxidizer #1R, as control, and exhausting at one (1) stack, identified as stack 1.

...

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The total volatile organic compounds (VOC) input to the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2) shall be limited such that its controlled VOC emissions will be less than 100 tons per twelve (12) consecutive months period, with compliance determined at the end of each month, based on 80% flash off and:

...

- (b) 68% overall VOC control efficiency by the catalytic oxidizer, identified as #1R, and 20 percent (by weight) ink VOC retention in the substrate, for the one (1) half web press and dryer, (ID Press #1).

...

D.1.2 New Facilities; General Reduction Requirements for Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 which requires use of BACT, CP 011-2057-00026 issued on January 6, 1993 and FESOP No. 011-11070-00026 issued on October 6, 1999 the two (2) natural gas fired catalytic oxidizers identified as catalytic oxidizer #1R and #2, respectively, shall operate with a minimum temperature of 650° F and 550° F, respectively, or a temperature established during the latest stack test, and the minimum air flow rate shall be maintained at ~~3,440~~ **1,440** acfm and 3,240 acfm, respectively, or an air flow rate established during the latest stack test. The catalytic oxidizer #2 shall have a capture efficiency of 100% and a control efficiency of 95%. The catalytic oxidizer #2 #1R shall have a capture efficiency of at least 75% combined with destruction efficiency of 95% that will ensure an overall control efficiency of at least 68%. The minimum temperature and air flow rates are permit limits requiring certification in accordance with General Condition B.10. Operation at or above the minimum temperature and air flow ensures compliance with the BACT requirements of 326 IAC 8-1-6.

D.1.5 Volatile Organic Compound Control

The capture system and the two (2) catalytic oxidizers, identified as catalytic oxidizer #1R and #2, shall be in operation at all times when the two (2) printing presses (Press #1 and #2) are in operation.

D.1.7 Catalytic Oxidizer Temperature and Air Flow Rate

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the two (2) catalytic oxidizers, identified as #1R and #2 used in conjunction with one (1) half web press and dryer, (ID Press #1) and one (1) web press and dryer (ID Press #2) for measuring operating temperature and air flow rate. The output of the temperature monitoring 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 the catalytic oxidizers (burners) #1R and #2 at or above the 3-hour average temperature of 650°F and 550°F, respectively, and the minimum air flow rate shall be maintained at ~~3,440~~ **1,440** acfm and 3,240 acfm, respectively.

...

D.1.9 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

- (a) The Permittee shall perform VOC testing on one (1) web press and dryer, (ID Press #2) and one (1) half web press and dryer, (ID Press #1) utilizing Methods 25 or 25A (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner within sixty (60) days of the issuance date of this permit. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to

these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

- (b) **In order to determine compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform VOC testing on Press #1 and the catalytic oxidizer (#1R), utilizing Methods 25 or 25A (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner within 180 days of startup of operations of the catalytic oxidizer (#1R). This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.**

D.1.10 Record Keeping Requirements

...

- (c) To document compliance with Condition D.1.7, the Permittee shall maintain continuous records of the combustion chamber temperature (on a 3-hour average basis) and air flow rates of the two (2) catalytic oxidizers, identified as #1R and #2 used in conjunction with the one (1) half web press and dryer, (ID Press #1) and the one (1) web press and dryer, (ID Press #2), when the heatset web offset printing presses are in operation and venting to the atmosphere.
- (d) To document compliance with Condition D.1.8, the Permittee shall maintain daily records of the duct pressure or fan amperage of the two (2) catalytic oxidizers, identified as #1R and #2.

...

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. The contact numbers for IDEM, OAQ have been changed throughout the permit as shown:

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

Telephone Number: 317-233-~~5674~~**0178**
Facsimile Number: 317-233-~~5967~~**6865**

2. General information in Section A.1 was updated. IDEM, OAQ has decided to remove the information regarding the Authorized Individual from Section A.1 of the permit. Listing the name and/or title in the permit has resulted in unnecessary administrative amendments in the past. Therefore, IDEM, OAQ does not consider it beneficial to maintain or update this information in the permits. IDEM, OAQ will continue to retain this information up-to-date in their permit tracking system.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary ~~source for operation of~~ heatset web offset printing press operation.

Authorized individual: _____ Plant Manager

...

3. In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence. Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule became effective March 16, 2005 and is incorporated into this permit under Section B Credible Evidence as follows.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

~~Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.~~ **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.**

Conclusion

This permit revision shall be subject to the conditions of the attached proposed Significant Permit Revision to a Federally Enforceable State Operating (FESOP) Permit No. 011-24345-00026.

**Appendix A: Emission Calculations
Natural Gas Combustion
Catalytic Oxidizer #1R**

Company Name: Maggie's Farm dba doodad
Address: 720 Ransdell Road, PO Box 772, Lebanon, IN 46052
SPR to FESOP: 011-24345-00026
Reviewer: ERG/ST
Date: 03/22/07

Heat Input Capacity MMBtu/hr
0.54

Potential Throughput MMCF/yr
4.64

Catalytic Oxidizer #1R, with a supplementary fuel heat input rate of 0.54 MMBtu/hr of natural gas

	Pollutant						
	PM	PM10	SO ₂	NOx	VOC	CO	HAPs
Emission Factor in lb/MMCF	1.9	7.6	0.6	100	5.5	84.0	1.89
Potential to Emit in tons/yr	4.406E-03	0.02	1.39E-03	0.23	0.01	0.19	4.383E-03

Emission factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4, SCC #1-01-006-02, #1-02-006-02, #1-03-006-02, #1-03-006-03 [7/98]
Emission Factor for NOx: uncontrolled = 100

Methodology:

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 1 ton/2,000 lbs