



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: December 5, 2008

RE: Mignone Communications, Inc. / 069-25446-00059

FROM: Matthew Stuckey, Branch 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, Suite N 501E, 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.dot12/03/07



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

**Federally Enforceable State Operating Permit  
Renewal  
OFFICE OF AIR QUALITY**

**Mignone Communications, Inc.  
860 & 880 East State Street  
Huntington, Indiana 46750**

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

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

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.: F069-25446-00059	
Issued by:	Issuance Date: December 5, 2008
<b>Original Signed By</b>	
Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Expiration Date: December 5, 2018

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY</b> .....	<b>4</b>
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Source Definition [326 IAC 2-8-1][ 326 IAC 2-7-1(22)]	
A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]	
A.5 FESOP Applicability [326 IAC 2-8-2]	
<b>B. GENERAL CONDITIONS</b> .....	<b>7</b>
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
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]	
B.17 Permit Renewal [326 IAC 2-8-3(h)]	
B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20 Source Modification Requirement [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]	
B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
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]	
B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS</b> .....	<b>16</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.8 Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
<b>Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]</b>	
C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]	

- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

- C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

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

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 23**

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

- D.1.1 FESOP [326 IAC 2-8-4]
- D.1.2 Volatile Organic Compounds (VOC) Limits [326 IAC 8-1-2 ][326 IAC 8-2-5]
- D.1.3 Preventative Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements [326 IAC 2-1.1-11][326 IAC 2-8-4]**

- D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]
- D.1.5 Emission Calculations [326 IAC 8-1-2]
- D.1.6 Testing Requirements [326 IAC 2-1.1-11]

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

- D.1.7 Continuous Monitoring System-RTO
- D.1.8 Parametric Monitoring

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

- D.1.9 Record Keeping Requirements
- D.1.10 Reporting Requirement

**D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 29**

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

- D.2.1 Particulate [326 IAC 6-3-2]

**Compliance Determination Requirements [326 IAC 2-1.1-11][326 IAC 2-8-4]**

- D.2.2 Particulate Control

**Certification Form ..... 30**  
**Emergency Occurrence Form..... 31**  
**Quarterly Report Form - VOC..... 33**  
**Quarterly Deviation and Compliance Monitoring Report Form..... 34**

## SECTION A SOURCE SUMMARY

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

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

---

The Permittee owns and operates a stationary commercial printing source.

Source Address:	860 & 880 East State Street, Huntington, Indiana 46750
Mailing Address:	880 East State Street, Huntington, Indiana 46750
General Source Phone Number:	(260) 358-0266
SIC Code:	2752
County Location:	Huntington
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Source Definition [326 IAC 2-8-1][ 326 IAC 2-7-1(22)]

---

This commercial printing source consists of a source with an on-site contractor:

- (a) Print Support, Inc., the supporting operation, is located at 860 East State Street, Huntington, Indiana 46750; and
- (b) Mignone Communications, Inc., the primary operation, is located at 880 East State Street, Huntington, Indiana 46750.

IDEM has determined that Print Support, Inc. and Mignone Communications, Inc. are under the common control of Mignone Communications, Inc. These two (2) plants are considered one (1) source because they are located on contiguous properties, have the same SIC code, the majority of product from one company is input to the other for further processing, and officers of both companies are directly involved with the day to day operations of both companies. Therefore, the term "source" in the FESOP documents refers to both Print Support, Inc. and Mignone Communications, Inc. as one source effective from the date of issuance of MSOP 069-14670-00059, issued on November 12, 2001. One combined FESOP will be issued under the name Mignone Communications, Inc.

### A.3 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) Two (2) heatset lithographic web press operations, consisting of:
  - (1) One (1) five-color heatset lithographic web press, identified as Press #1, maximum operating rate: fourteen hundred (1,400) feet per minute, maximum printing capacity: thirty-eight and two-tenths (38.2) million square inches per hour (MMin<sup>2</sup>/hr), constructed in 1998, exhausting to Dryer #1.

- (2) One (1) natural gas-fired dryer, identified as Dryer #1, constructed in 1998, rated at two and forty-two hundredths (2.42) million British thermal units per hour (MMBtu/hr), exhausting to a regenerative thermal oxidizer (RTO1).
- (3) One (1) six-color heatset lithographic web press, identified as Press #3, maximum operating rate: thirteen hundred seventy-eight (1,378) feet per minute, maximum printing capacity: nineteen and eighty-four hundredths (19.84) million square inches per hour (MMin<sup>2</sup>/hr), constructed in 2004, exhausting to Dryer #3.
- (4) One (1) natural gas-fired dryer, identified as Dryer #3, rated at one and thirteen hundredths (1.13) million British thermal units per hour (MMBtu/hr), constructed in 2004, exhausting to a regenerative thermal oxidizer (RTO1).

NOTE: The one (1) natural gas-fired regenerative thermal oxidizer (RTO1), rated at two and three-tenths (2.3) million British thermal units per hour (MMBtu/hr), constructed in 2004, exhausting to Stack 1, and common control to Press #1 and Press #3.

- (b) One (1) non-heatset lithographic web press operation, consisting of:
  - (1) One (1) five-color non-heatset lithographic web press, identified as Press #2, maximum operating rate: twenty-eight hundred forty-four (2,844) feet per minute, maximum printing capacity: seventy-one and sixty-seven hundredths (71.67) million square inches per hour (MMin<sup>2</sup>/hr), constructed in 2001, exhausting inside the building, and located at the Print Support, Inc. plant.

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

- (c) Trimmers that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone, including bindery and finish trimmers. [326 IAC 2-1.1-3(e)(14)] Emission units matching this description include:
  - (1) One (1) binding and finish trimming operation, installed in 2001, with a dust collection system utilizing a fabric filter for particulate control, with a maximum capacity of thirteen thousand standard cubic feet per minute (13,000 scfm), and exhausting inside the building,.
- (d) Natural gas-fired combustion sources with heat input less than or equal to ten million ( $\leq 10,000,000$ ) British thermal units per hour (MMBtu/hr), including:
  - (1) One (1) natural gas-fired comfort heater rated at one hundred thirty-one thousandths (0.131) million British thermal units per hour (MMBtu/hr), installed in 2001, exhausting inside the building,
- (e) One (1) small label press (a.k.a. ink jet printer), with negligible VOC emissions.
- (f) Pre-press operations, including plate processing and film developing, both with negligible VOC emissions.
- (g) One (1) bailer.

#### 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).

***The remainder of this page is intentionally left blank.***

## 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, F069-25446-00059, is issued for a fixed term of ten (10) 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 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

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

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

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

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

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

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

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

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

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

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

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

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

- (a) All terms and conditions of permits established prior to F069-25446-00059 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
and

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

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

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

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

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

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (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 make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

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

#### C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolitions 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 Licensed 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 Licensed 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. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

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

---

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

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

---

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

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

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

---

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

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

---

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

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

---

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

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

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

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

---

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

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

---

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 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.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

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

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

***The remainder of this page is intentionally left blank.***

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Two (2) heatset lithographic web press operations, consisting of:
- (1) One (1) five-color heatset lithographic web press, identified as Press #1, maximum operating rate: fourteen hundred (1,400) feet per minute, maximum printing capacity: thirty-eight and two-tenths (38.2) million square inches per hour (MMin<sup>2</sup>/hr), constructed in 1998, exhausting to Dryer #1.
  - (2) One (1) natural gas-fired dryer, identified as Dryer #1, constructed in 1998, rated at two and forty-two hundredths (2.42) million British thermal units per hour (MMBtu/hr), exhausting to a regenerative thermal oxidizer (RTO1).
  - (3) One (1) six-color heatset lithographic web press, identified as Press #3, maximum operating rate: thirteen hundred seventy-eight (1,378) feet per minute, maximum printing capacity: nineteen and eighty-four hundredths (19.84) million square inches per hour (MMin<sup>2</sup>/hr), constructed in 2004, exhausting to Dryer #3.
  - (4) One (1) natural gas-fired dryer, identified as Dryer #3, rated at one and thirteen hundredths (1.13) million British thermal units per hour (MMBtu/hr), constructed in 2004, exhausting to a regenerative thermal oxidizer (RTO1).

NOTE: The one (1) natural gas-fired regenerative thermal oxidizer (RTO1), rated at two and three-tenths (2.3) million British thermal units per hour (MMBtu/hr), constructed in 2004, exhausting to Stack 1, and common control to Press #1 and Press #3,.

- (b) One (1) non- heatset lithographic web press operation, consisting of:
- (1) One (1) five-color non-heatset lithographic web press, identified as Press #2, maximum operating rate: twenty-eight hundred forty-four (2,844) feet per minute, maximum printing capacity: seventy-one and sixty-seven hundredths (71.67) million square inches per hour (MMin<sup>2</sup>/hr), constructed in 2001, exhausting inside the building, and located at the Print Support, Inc. plant.

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

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

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

Pursuant to 326 IAC 2-8-4, the VOC input to the three (3) lithographic web presses (Press #1, Press #2 and Press #3) and the associated clean-up operations, shall be limited such that the VOC emissions shall not exceed ninety-nine (99) tons per twelve (12) consecutive month period.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide potential to emit VOC to less than ninety-nine and nine-tenths (99.9) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70) and 326 IAC 2-2, PSD, are not applicable.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5][326 IAC 8-1-2]

Pursuant to 326 IAC 8-2-5, no owner or operator of a coating line may permit the discharge into

the atmosphere of any VOC in excess of two and nine tenths (2.9) pounds VOC per gallon of coating, excluding water, or the equivalent emission limit as determined from the equation in 326 IAC 8-1-2 (b).

The Permittee shall comply with the emission limitations in 326 IAC 8 as follows:

(a) For heatset presses #1 & #3

- (1) In order to comply with 326 IAC 8-1-2(a)(2), the Permittee shall use a regenerative thermal oxidizer, RTO1, for control of VOC emissions from the two (2) heatset web lithographic presses, Press #1 & Press #3.
- (2) Pursuant to 326 IAC 8-1-2(c), the overall control efficiency of the regenerative thermal oxidizer shall equal or exceed the equivalent overall efficiency when calculated using the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids, as applied. Alternatively, the VOC content of the worst case coating may be substituted for the daily weighted average.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids, as applied.

O = Equivalent overall efficiency of the control device as a percentage.

Therefore, the overall control efficiency of the regenerative thermal oxidizer shall be greater than the value of "O" as calculated above. In order to comply with 326 IAC 8-1-2(c), the overall control efficiency of the regenerative thermal oxidizer, RTO1, used by the heatset lithographic web Presses #1 and #3, shall be no less than 28.56%.

- (3) Pursuant to 326 IAC 8-1-2 (b), VOC emissions shall be limited to no greater than the equivalent emissions limit, expressed as pounds of VOC per gallon of coating solids, as applied.

This equivalency shall be determined using the following equation:

$$E = L / (1 - (L/D))$$

Where

L= Applicable emission limit from 326 IAC 8, in pounds of VOC per gallon of coating, less water;

D= Baseline solvent density of VOC in the coating shall be equal to seven and thirty-six hundredths (7.36) pounds of VOC per gallon of solvent;

E = Equivalent Emission Limit in pounds of VOC per gallon of coating solids, as applied. For the 326 IAC 8-2-5 limit of 2.9 lbs VOC/gal coating, less water, the equivalent emission limit, E = 4.79 lbs VOC/gal solids.

- (4) Compliance with the equivalent emission limit established above shall be determined according to the following equation:

$$E_a = L_a / (1 - (L_a/D_a))$$

Where:

$L_a$  = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids, as applied. The VOC content of the worst case coating may be substituted for the weighted average in this equation.

$D_a$  = Actual density of VOC in coating, as applied, in pounds VOC per gallon of solvent.

$E_a$  = Actual emissions, in pounds of VOC per gallon of coating solids, as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2.

- (b) For the non-heatset press #2

Pursuant to 326 IAC 8-1-2(a)(7), the source shall comply using either compliant coatings or, when non-compliant coatings are used, a daily volume-weighted average.

- (1) The surface coating operations performed with the non-heatset lithographic web press #2 shall use compliant coatings.
- (2) The source shall record the manufacturer's product number and the amount of each coating used each day.
- (3) When non-compliant coatings are used, the daily volume-weighted VOC content shall be calculated using the following equation:

Where:

$$A = (\sum C \times U) / (\sum U)$$

A = Volume weighted average (pounds VOC/gallon, less water as applied);

C = VOC content of the coating (pounds VOC/gallon, less water as applied); and

U = Usage rate of the coating (gallons/day).

**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 the heatset lithographic web presses (identified as Presses #1 & #3) the trimmer, and their respective control devices.

**Compliance Determination Requirements**

**D.1.4 VOC Control System [326 IAC 2-8-4] [326 IAC 8-1-12]**

In order to comply with Conditions D.1.1 - D.1.2, the Permittee shall:

- (a) Operate the regenerative thermal oxidizer capture & control system, at all times the heatset lithographic web presses #1 & #3 are in operation.
- (b) Operate the regenerative thermal oxidizer at or above the minimum combustion zone temperature of 1,600°F or a temperature, as determined in the most recent compliant stack test, to maintain a minimum destruction efficiency of greater than or equal to ninety-five percent (95%) of captured organic compounds.
- (c) Operate the regenerative thermal oxidizer such that the duct static pressure is within the range established from the most recent compliant stack test.
- (d) Operate the VOC capture and control system using the settings and conditions obtained during the most recent valid compliance demonstration.

**D.1.5 Emission Calculations [326 IAC 8-1-2]**

- (a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1 - D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with Conditions D.1.1 - D.1.2 shall be demonstrated within thirty (30) days of the end of each month. This shall be based on the total VOC input for the previous month and adding it to the previous 11 months total VOC input, so as to arrive at the VOC input for the most recent twelve (12) consecutive month period.
- (c) Compliance with Condition D.1.1 shall be determined based on the following equation:  
$$\text{VOC emitted (tons)} = [\text{VOC input at Presses \#1 and \#3 (tons)} \times 80\% \text{ flash off} \times (100 - 95\% \text{ overall control efficiency (or the efficiency obtained during the most recent valid compliance demonstration))}] + [\text{VOC input at Press \#2 (tons)} \times 5\% \text{ flash off}] + [\text{VOC usage from all cleaners and solvents (tons)}]$$
- (d) The flash off factors to be used in the emission calculations shall be obtained from the U.S. EPA's "Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing", (September 2006).

**D.1.6 Testing Requirements [326 IAC 2-1.1-11]**

- (a) In order to comply with Conditions D.1.1 & D.1.2, the Permittee shall conduct Compliance tests on the regenerative thermal oxidizer RTO1, to determine the minimum combustion zone temperature at which ninety-five percent (95%) of volatile organic compounds are

destroyed. This test shall be performed on the regenerative thermal oxidizer RTO1 at least once every five (5) years from the date of the previous valid compliance demonstration. The stack test shall be performed utilizing Method 25 or 25A (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

- (b) In order to comply with Conditions D.1.1 & D.1.2, the Permittee shall conduct Compliance tests to verify VOC capture efficiency of the regenerative thermal oxidizer (identified as RTO1). This test shall be performed at least once every five (5) years from the date of the previous valid Compliance demonstration, utilizing EPA Method 204 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing. The last compliance stack testing was conducted on August 4, 2004.
- (c) In addition to the requirements stated above, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

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

#### **D.1.7 Continuous Monitoring System - RTO**

---

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer, RTO1, for measuring combustion zone temperature. The output of this system shall be recorded as a 3-hour average.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.6, as approved by IDEM.
- (c) Pursuant 326 IAC 8-1-12(c)(6)(A)(ii), the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature is more than fifty degrees Fahrenheit (50°F) below the 3-hour average temperature from the most recent compliant stack test. A 3-hour average temperature reading that is more than 50°F below the 3-hour average temperature from the most recent compliant stack test is not a deviation from this permit, however, failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### **D.1.8 Parametric Monitoring**

---

- (a) The Permittee shall determine duct (static) pressure (or fan amperage) from the most recent valid stack test that demonstrates compliance with Condition D.1.6, as approved by IDEM. A normal range for the duct (static) pressure (or fan amperage) shall be determined from the most recent compliant stack test
- (b) The duct pressure (or fan amperage) shall be observed at least once per day when the regenerative thermal oxidizer, RTO1, is operating. When, for any one reading, the duct pressure (or fan amperage) is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C -Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit, however, failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

### **D.1.9 Record Keeping Requirements**

---

- (a) Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with Conditions D.1.1 - D.1.2, D.1.5 - D.1.6, and D.1.7 - D.1.8.
  - (1) Documentation shall include purchase orders, invoices, material safety data sheets (MSDS), Product Data sheets (PDS), or other necessary information to verify the formulation and amount of VOC and HAP used.
  - (2) For all coatings and solvents used, a record shall be kept of the following:
    - (A) The VOC, HAP, and solids content.
    - (B) The amount of coating material used, less water, on monthly basis. Ink & varnish usage records shall indicate whether the coating was used in heatset or non-heatset mode.
    - (C) The amount of solvent used, less water, on monthly basis. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The VOC content (weight %) and HAP content (weight %) of the coatings used each month shall be determined;
  - (4) For each press, the total VOC and HAP usage for each month; and
  - (5) The weight of VOC and HAP emitted for each compliance period.
  - (6) The continuous temperature records (on a three (3) hour average basis) for the regenerative thermal oxidizer RTO1 and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.
  - (7) Daily records of the duct pressure (or fan amperage).
- (b) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain on-site, a copy of the compliance test results which established the operating temperature and duct (static) pressure that correspond to the required minimum destruction efficiency.
- (c) A log shall be maintained in which all repairs and maintenance to the capture and control systems are recorded. Dated notations documenting reconfiguration of any portion of the capture and control system shall be included.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.10 Reporting Requirement**

---

A quarterly summary of the information to document compliance with Conditions D.1.1 - D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

(a) Trimmers that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone, including bindery and finish trimmers. 326 IAC 2-1.1-3(e)(14)  
Emission units matching this description include:

- (1) One (1) binding and finish trimming operation, installed in 2001, with a dust collection system utilizing a fabric filter for particulate control, a maximum capacity of thirteen thousand standard cubic feet per minute (13,000 scfm), and exhausting inside the building.

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

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

#### D.2.1 Particulate [326 IAC 2-1.1-3]]

---

Pursuant to 326 IAC 2-1.1-3(e)(14), the trimming and binding operations are exempt from the requirements of 326 IAC 2-7. In order to comply with this exemption, the dust collection system associated with the trimming and binding equipment shall be in operation at all times that said equipment is in operation.

### Compliance Determination Requirement

#### D.2.2 Particulate [326 IAC 6-3-2] [326 IAC 2-2]

---

Pursuant to 326 IAC 2-1.1-3 and in order that the requirements of 326 IAC 2-2 and 326 IAC 2-7 do not apply, particulate from the binding and finish trimming operations shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Mignone Communications, Inc.  
Source Address: 880 East State Street, Huntington, Indiana 46750  
Mailing Address: 880 East State Street, Huntington, Indiana 46750  
FESOP Permit No.: F069-25446-00059

**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: Mignone Communications, Inc.  
Source Address: 880 East State Street, Huntington, Indiana 46750  
Mailing Address: 880 East State Street, Huntington, Indiana 46750  
FESOP Permit No.: F069-25446-00059

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• 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</li><li>• 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</li></ul> |
|--|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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: Mignone Communications, Inc.  
Source Address: 880 East State Street, Huntington, Indiana 46750  
Mailing Address: 880 East State Street, Huntington, Indiana 46750  
FESOP Permit No.: F069-25446-00059  
Facility: Lithographic Web Presses #1, #2 and #3  
Parameter: **Volatile Organic Compounds (VOC)**  
Limit: 99 tons per twelve (12) consecutive month period

Compliance is determined at the end of each month, based on the following equation:

$$\text{VOC emitted (tons)} = [\text{VOC input at Presses \#1 and \#3 (tons)} \times 0.80 \text{ flash off} \times (0.05 \text{ emitted after control})] \\ + [\text{VOC input at Press \#2 (tons)} \times 0.05 \text{ flash off}] + [\text{VOC usage from all cleaners and solvents (tons)}]$$

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC usage for this Month	VOC usage for previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE DATA SECTION**  
**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)**  
**QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Mignone Communications, Inc.  
 Source Address: 880 East State Street, Huntington, Indiana 46750  
 Mailing Address: 880 East State Street, Huntington, Indiana 46750  
 FESOP Permit No.: F069-25446-00059

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Mignone Communications, Inc.</b>
<b>Source Location:</b>	<b>880 East State Street, Huntington, Indiana 46750</b> <b>860 East State Street, Huntington, Indiana 46750</b>
<b>County:</b>	<b>Huntington</b>
<b>SIC Code:</b>	<b>2752</b>
<b>Permit Renewal No.:</b>	<b>F069-25446-00059</b>
<b>Permit Reviewer:</b>	<b>Sandra Carr</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Mignone Communications, Inc. relating to the operation of a commercial printing source.

**History**

Mignone Communications, Inc. was issued a permit to construct and operate a commercial printing source on October 5, 1998. This minor source operating permit (MSOP) was subsequently modified on November 16, 2000 and November 12, 2001. In November of 2002, Mignone Communications, Inc. applied for a Federally Enforceable State Operating Permit (FESOP) which was issued on July 21, 2003 under permit number 069-16460-00059. On February 23, 2004, the FESOP was administratively amended to replace two catalytic oxidizers with one regenerative thermal oxidizer for VOC emission control. On October 24, 2007, Mignone Communications, Inc. submitted an application to the OAQ requesting to renew its operating permit.

**Source Definition**

This commercial printing source consists of a source with an on-site contractor:

- (a) Print Support, Inc., the supporting operation, is located at 860 East State Street, Huntington, Indiana 46750; and
- (b) Mignone Communications, Inc., the primary operation, is located at 880 East State Street, Huntington, Indiana 46750.

IDEM has previously determined that Print Support, Inc. and Mignone Communications, Inc. are under the common control of Mignone Communications, Inc. These two (2) plants are considered one (1) source because they are located on contiguous properties, have the same SIC code, the majority of product from one company is input to the other for further processing, and officers of both companies are directly involved with the day to day operations of both companies. Therefore, the term "source" in the FESOP documents refers to both Print Support, Inc. and Mignone Communications, Inc. as one source effective from the date of issuance of MSOP 069-14670-00059, which was on November 12, 2001. One combined FESOP renewal will be issued under the name Mignone Communications, Inc.

### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and controls:

- (a) Two (2) heatset lithographic web press operations, consisting of:
  - (1) One (1) five-color heatset lithographic web press, identified as Press #1, maximum operating rate: fourteen hundred (1,400) feet per minute, maximum printing capacity: thirty-eight and two-tenths (38.2) million square inches per hour (MMin<sup>2</sup>/hr), constructed in 1998, exhausting to Dryer #1.
  - (2) One (1) natural gas-fired dryer, identified as Dryer #1, constructed in 1998, rated at two and forty-two hundredths (2.42) million British thermal units per hour (MMBtu/hr), exhausting to a regenerative thermal oxidizer (RTO1).
  - (3) One (1) six-color heatset lithographic web press, identified as Press #3, maximum operating rate: thirteen hundred seventy-eight (1,378) feet per minute, maximum printing capacity: nineteen and eighty-four hundredths (19.84) million square inches per hour (MMin<sup>2</sup>/hr), constructed in 2004, exhausting to Dryer #3.
  - (4) One (1) natural gas-fired dryer, identified as Dryer #3, rated at one and thirteen hundredths (1.13) million British thermal units per hour (MMBtu/hr), constructed in 2004, exhausting to a regenerative thermal oxidizer (RTO1).

NOTE: The one (1) natural gas-fired regenerative thermal oxidizer (RTO1), rated at two and three-tenths (2.3) million British thermal units per hour (MMBtu/hr), constructed in 2004, exhausting to Stack 1, and common control to Press #1 and Press #3..

- (b) One (1) non-heatset lithographic web press operation, consisting of:
  - (1) One (1) five-color non-heatset lithographic web press, identified as Press #2, maximum operating rate: twenty-eight hundred forty-four (2,844) feet per minute, maximum printing capacity: seventy-one and sixty-seven hundredths (71.67) million square inches per hour (MMin<sup>2</sup>/hr), constructed in 2001, exhausting inside the building, and located at the Print Support, Inc. plant.

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

- (c) Trimmers that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone, including bindery and finish trimmers. [326 IAC 2-1.1-3(e)(14)] Emission units matching this description include:
  - (1) One (1) binding and finish trimming operation, installed in 2001, with a dust collection system utilizing a fabric filter for particulate control, with a maximum capacity of thirteen thousand standard cubic feet per minute (13,000 scfm), and exhausting inside the building.
- (d) Natural gas-fired combustion sources with heat input less than or equal to ten million ( $\leq 10,000,000$ ) British thermal units per hour (MMBtu/hr), including:
  - (1) One (1) natural gas-fired comfort heater rated at one hundred thirty-one thousandths (0.131) million British thermal units per hour (MMBtu/hr), installed in 2001, exhausting inside the building,

- (e) One (1) small label press (a.k.a. ink jet printer), with negligible VOC emissions.
- (f) Pre-press operations, including plate processing and film developing, both with negligible VOC emissions.
- (g) One (1) bailer.

### Existing Approvals

Since the issuance of the FESOP (069-16460-00059) on July 21, 2003, the source has constructed or has been operating under the following approval:

- (a) Administrative Amendment No. 069-18356-00059, issued on February 23, 2004.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this FESOP Renewal:

- (a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction. Conditions D.1.1, D.1.2, and D.1.3 were removed.

### Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

### County Attainment Status

The source is located in Huntington County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.  
Unclassifiable or attainment effective April 5, 2005, for PM<sub>2.5</sub>.

(Air Pollution Control Board; 326 IAC 1-4-36; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA)

- (a) Ozone Standards
  - (1) 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.

- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
  - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
  - (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Huntington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Huntington County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions, and the effective date of these rules was July 15<sup>th</sup>, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.
  - (c) Other Criteria Pollutants  
Huntington County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
  - (d) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

### Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of Mignone Communications.

- (a) The potential to emit as defined in 326 IAC 2-1.1-1(16) of VOC and PM<sub>10</sub> are still equal to or greater than one hundred (100) tons per year. This source, otherwise required to obtain a Title V permit, has agreed to continue to accept a permit with federally enforceable limits that restrict its PTE of VOC and PM<sub>10</sub> to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP) renewal, pursuant to 326 IAC 2-8.
- (b) The potential to emit, as defined in 326 IAC 2-7-1(29), of all other criteria pollutants are less than one hundred (100) tons per year.
- (c) The potential to emit, as defined in 326 IAC 2-7-1(29), of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAP is less than twenty-five (25) tons per year.
- (d) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

**Potential to Emit After Issuance**

This source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP Renewal and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit (tons/year)								
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP	Combined HAP
Presses #1 & Dryer #1	-	-	-	-	<99 <sup>(a)</sup>	-	-	(Glycol Ethers) 0.01	0.01
Presses #3 & Dryer #3	-	-	-	-		-	-	(Glycol Ethers) 0.01	0.01
Press #2	-	-	-	-		-	-	(Glycol Ethers) 1.46	1.95
Dryer #1 & Dryer #3 (combustion only)	0.12	0.12	0.12	Negli	0.08	1.28	1.52	Negli	0.05
Insignificant Activities	0.08	0.08	0.08	Negli	0.06	0.88	1.04	Negli	Negli
<b>Total PTE of Entire Source</b>	<b>0.20</b>	<b>0.20</b>	<b>0.20</b>	<b>Negli</b>	<b>&lt;99.9</b>	<b>2.16</b>	<b>2.57</b>	<b>1.47</b>	<b>2.02</b>
Title V Major Source Threshold	NA	100	100	100	100	100	100	10	25
PSD Major Source Threshold	250	250	250	250	250	250	250	NA	NA

"Negli"= Negligible The term "Negligible" is used to denote an emission level of a pollutant of less than 0.01 tons per year.  
"-." = Denotes a process or emission unit which does not emit specified pollutant.  
(a) = VOC emissions from Presses #1 & #3 are controlled using a combination of Permanent Total Enclosures and a regenerative thermal oxidizer. Control system was operated at 99.4% overall control efficiency.

- (a) Although the potential to emit VOC from the three (3) lithographic web presses is greater than two hundred fifty tons per year (250 tons/yr), the source has agreed to continue to limit VOC emissions to less than ninety-nine (99) tons per twelve (12) consecutive month period. The potential to emit for all other criteria pollutants is less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, this existing stationary source is not major for PSD (326 IAC 2-2) because the emissions of each criteria pollutant are less than two hundred fifty tons per year (250 ton/yr) and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

**Federal Rule Applicability**

New Source Performance Standards (NSPS)

- (a) 40 CFR 60 Subpart E-Standards of Performance for Incinerators  
An Incinerator is defined in 40 CFR 60.51 as any furnace used in the process of burning solid waste for the purpose of reducing the volume of the waste by removing combustible

matter. Affected facilities which are subject to 40 CFR 60 Subpart E are each incinerator of more than forty-five metric tons per day charging rate (45 tons/day). The regenerative thermal oxidizer at this source is used as a control device for VOC and HAP emissions and therefore, does not fit the definition of an incinerator specified in 40 CFR 60.51. Thus, 40 CFR 60 Subpart E is still not applicable and is not included in this permit for this source.

(b) 40 CFR 60 Subpart QQ-Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing

Affected facilities which are subject to 40 CFR 60 Subpart QQ are publication rotogravure printing presses. This source uses heatset and non-heatset lithographic web printing presses. None of these presses use a gravure cylinder, as is defined in Subpart QQ, so none of the facilities are publication rotogravure printing presses. Thus, 40 CFR 60 Subpart QQ is still not included in this permit for this source.

(c) 40 CFR 60 Subpart RR-Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations

Affected facilities which are subject to 40 CFR 60 Subpart RR are coating lines used in the manufacture of pressure sensitive tape and label materials and which began construction, modification, or reconstruction after December 30, 1980. This source does not manufacture pressure sensitive tape and label materials and is, therefore, not subject to this standard. Thus, 40 CFR 60 Subpart RR is still not included in this permit for this source.

(d) 40 CFR 60 Subpart FFF-Standards of Performance for Flexible Vinyl and Urethane Coating and Printing

Affected facilities which are subject to 40 CFR 60 Subpart FFF are rotogravure printing lines used to print or coat flexible vinyl or urethane products and which began construction, modification, or reconstruction after January 18, 1983. None of the presses at this source use a gravure cylinder as defined in 60.581, so none of the press operations constitute a rotogravure printing line. Thus, 40 CFR 60 Subpart FFF is still not included in this permit for this source.

(e) 40 CFR 60 Subpart VVV—Standards of Performance for Polymeric Coating of Supporting Substrates Facilities

Affected facilities which are subject to 40 CFR 60 Subpart VVV are each coating operation and any onsite coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates and for which construction, modification, or reconstruction began after April 30, 1987, except for the facilities specified in 60.740 paragraph (d). This source has no process which applies elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil. Additionally, 60.740(d)(3) states that Web coating operations that print an image on the surface of the substrate or any coating applied on the same printing line that applies the image are not subject to this subpart.

For the reasons cited above, 40 CFR 60 Subpart VVV is still not included in this permit for this source.

(f) There are still no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this renewal of the FESOP permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(g) 40 CFR 63.460, Subpart T- National Emission Standards for Halogenated Solvent Cleaning  
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, 40 CFR 63.460, Subpart T, are not included

in the permit for the insignificant degreasing operations at this source because halogenated solvents are not used at these facilities; thus NESHAP Subpart T does not apply.

(h) 40 CFR 63.820, Subpart KK - National Emission Standards for the Printing and Publishing Industry

This standard applies to major sources of hazardous air pollutants (HAP), at which publication rotogravure, product and packaging rotogravure or wide-web flexographic printing presses are operated. The printing presses at this source are lithographic web presses and are not subject to this NESHAP because they are not publication, product and packaging rotogravure printing presses, or wideweb flexographic printing presses, and this source is not a major source for single HAP and/or combined HAP. Therefore, this source is still not subject to the requirements of 40 CFR 63.820, Subpart KK.

(i) 40 CFR 63.3290, Subpart JJJJ -National Emission Standards for Paper and other Web Coating Industry

This standard applies to major sources of hazardous air pollutants (HAP), at which coating of folding paper board boxes, packing paper, label, medical tape, foil, commercial printing, etc. takes place. The presses located at the source are lithographic web presses and are not subject to this NESHAP because the source is not a major source for single HAP and/or combined HAP and web coating in lithography is specifically exempted by 63.3300(c). Therefore, this source is still not subject to the requirements of 40 CFR 63.3290, Subpart JJJJ.

(j) 40 CFR 63.4280, Subpart OOOO-National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles

The affected source for the web coating and printing subcategory is the collection of all of the items listed in paragraphs 63.4382(b) (1) through (5) such as web coating and printing equipment, storage containers, mixing vessels, cleaning materials, and waste treatment processes that are used in fabric and other textiles web coating and printing operations.

This standard applies to affected sources which are major sources of hazardous air pollutants (HAP) as a result of the web coating and printing of fabric and other textiles. Pursuant 63.4281(1), web coating lines exclusively dedicated to coating or printing fabric and other textiles are subject to this subpart.

Since this source still has no equipment that is exclusively dedicated to web coating or printing of fabric or other textiles and is not a major source of HAP, this source is still not subject to the requirements of 40 CFR 63.4280, Subpart OOOO.

(k) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

Compliance Assurance Monitoring (CAM)

(l) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is still limited to less than the Title V major source thresholds and the source is still not required to obtain a Part 70 or Part 71 permit.

**State Rule Applicability - Entire Source**

The following state rule requirements are included in this permit renewal. The source shall continue to comply with all other applicable state rule requirements and permit conditions as contained in FESOP No. 069-16460-00059 and Administrative Amendment No. 069-18356-00059.

The following state rules are applicable to this renewal:

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source submitted a Preventive Maintenance Plan (PMP) on July 23, 2002. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

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

This source continues as a commercial printing operation, which is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and to which there have been no modifications or revisions that were major modifications pursuant to 326 IAC 2-2 or 326 IAC 2-3.

This commercial printing source has been operating under the provisions of FESOP No. F069-16460-00059 since July 21, 2003. Based on the existing FESOP, Mignone Communications continues operations as a PSD minor source.

On October 24, 2007, the Permittee submitted an application to IDEM, OAQ requesting to renew their permit to operate this existing commercial printing source under the provisions of 326 IAC 2-8 (FESOP) with its federally enforceable limits. This review of an existing PSD minor stationary source will not change the PSD minor status because the emissions of all criteria pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, the provisions of 326 IAC 2-2 (PSD) still do not apply.

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

The requirements of 326 IAC 2-4.1 apply to sites which are major sources of HAP emissions. This source is still not subject to 326 IAC 2-4.1 because they do not have the uncontrolled potential to emit any single HAP that is greater than ten (10) tons per twelve (12) consecutive month period, or any combination of HAP that is greater than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the source is still not subject to the requirements of 326 IAC 2-4.1. See the "Potential to Emit After Issuance" Section above.

326 IAC 2-6 (Emission Reporting)

Mignone Communications is still not subject to the periodic reporting requirements of 326 IAC 2-6 (Emission Reporting) because:

- (1) Pursuant to 326 IAC 2-7-2(b)(5), a major source may become non-major through the issuance of a federally enforceable state operating permit (FESOP). Therefore, this source is exempt from the requirement to have a Part 70 permit because, although it has the potential to be a major source for VOC, it has become non-major through the issuance of FESOP F069-16460-00059 in which it agreed to limit emission of all criteria pollutants to less than major source levels.
- (2) This source is located in Huntington County and
- (3) This source does not have the potential to emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

However, pursuant to 326 IAC 2-6-1(b) Mignone Communications is still subject to the additional information requests in 326 IAC 2-6-5.

326 IAC 2-8-4 (Federally Enforceable State Operating Permit (FESOP))

Pursuant to 326 IAC 2-8-4, the amount of PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, and CO emitted shall each be less than one hundred (100) tons per year. Under current operating conditions all criteria pollutants, except VOC, comply with the 326 IAC 2-8-4 limits. [See the "Potential to Emit After Issuance" Section above.]

- (a) In order to comply with 326 IAC 2-8-4 for VOC, the Permittee shall:
- (1) Limit the VOC delivered to the applicators at presses #1, #2 & #3, such that the potential to emit VOC from the three lithographic web presses shall be less than ninety-nine (99) tons per twelve (12) consecutive month period, with compliance determined at the end of each month, and
  - (2) Operate the regenerative thermal oxidizer system using a minimum overall control efficiency of ninety-five percent (95%) or the overall control efficiency obtained from the most recent valid compliance test. [In the previous permit, FESOP F069-16460-00059, the required minimum efficiency was lower (71%) due to the use of a different control device (catalytic oxidizer).]

The unlimited potential VOC emissions from non-heatset press #2, is equal to 45.76 tons per year. Press #2 is not controlled by the regenerative thermal oxidizer and the PTE is not limited by this permit.

The above limits restrict VOC emissions to less than ninety-nine (99) tons per year and the unrestricted potential to emit VOC from all insignificant activities, including combustion from the dryers, is no more than one (1) ton per year. Therefore, the potential to emit VOC from the entire source is limited to less than one hundred (100) tons per year.

- (b) The potential to emit VOC from the three (3) presses will be based on the following equation:

$$\text{VOC emitted (tons)} = [\text{VOC input at Presses \#1 and \#3 (tons)} \times 80\% \text{ flash off} \\ \times (100 - 95\% \text{ overall control efficiency})] + [\text{VOC input at Press \#2 (tons)} \times 5\% \text{ flash off}] \\ + [\text{VOC usage from all cleaners and solvents (tons)}]$$

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

#### 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 Exemptions), opacity shall continue to meet the following conditions, unless otherwise stated in the permit:

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

#### 326 IAC 6-4 (Fugitive Dust Emissions)

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

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

The requirements of 326 IAC 6-5 apply to sources with potential fugitive particulate emissions equal to or greater than twenty-five tons PM per year ( $\geq 25$  tons PM/yr). The potential fugitive

particulate emissions, as defined in 326 IAC 6-5-2, from this source are less than twenty-five tons PM per year (25 tons PM/yr). Therefore, the requirements of 326 IAC 6-5 are still not applicable.

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

This commercial printing source was constructed and commenced operations in 1998. The provisions of 326 IAC 8-6 (Organic Solvent Emission Limitations) still do not apply to this source because this source did not commence its operation during the period after October 7, 1974 and prior to January 1, 1980.

#### 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

The provisions of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) do not apply to this source because the source is still located in Huntington County.

### State Rule Applicability – Lithographic Web Presses

#### 326 IAC 8-1-2 (Volatile Organic Compound - Compliance Methods)

Pursuant to 326 IAC 8-1-2 (b), VOC emissions shall be limited to no greater than the equivalent emissions limit, expressed as pounds of VOC per gallon of coating solids.

This equivalency shall be determined using the following equation:

$$E = L / (1 - (L/D))$$

Where

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating, less water;

D= Baseline solvent density of VOC in the coating shall be equal to seven and thirty-six hundredths (7.36) pounds of VOC per gallon of solvent;

E= Equivalent Emission Limit in pounds of VOC per gallon of coating solids as applied. For the 326 IAC 8-2-5 limit of 2.9 lbs VOC/gal coating, less water, the equivalent emission limit, E = 4.79 lbs VOC/gal solids.

Compliance with the equivalent emission limit established above shall be determined according to the following equation:

$$E_a = L_a / (1 - (L_a/D_a))$$

Where:

L<sub>a</sub> = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied. The VOC content of the worst case coating may be substituted for the weighted average in this equation.

D<sub>a</sub> = Actual density of VOC in coating, as applied, in pounds VOC per gallon of solvent.

E<sub>a</sub> = Actual emissions, in pounds of VOC per gallon of coating solids, as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2.

The Permittee shall comply with the emission limitations in 326 IAC 8 as follows:

(a) For heatset presses #1 & #3

- (1) In order to comply with 326 IAC 8-1-2(a)(2), the Permittee shall use a regenerative thermal oxidizer, RTO1, for control of VOC emissions from the two (2) heatset web lithographic presses, Press #1 & Press #3.
- (2) Pursuant to 326 IAC 8-1-2(c), the overall control efficiency of the regenerative thermal oxidizer shall equal or exceed the equivalent overall efficiency when calculated using the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids, as applied. Alternatively, the VOC content of the worst case coating may be substituted for the daily weighted average.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids, as applied.

O = Equivalent overall efficiency of the control device as a percentage.

Therefore, the overall control efficiency of the regenerative thermal oxidizer shall be greater than the value of "O" as calculated above.

(b) For the non-heatset press #2

- (1) Pursuant to 326 IAC 8-1-2(a)(7), the source shall comply using either compliant coatings or, when non-compliant coatings are used, a daily volume-weighted average.
  - (A) The surface coating operations performed with the non-heatset lithographic web press #2 shall use compliant coatings.
  - (B) The source shall record the manufacturer's product number and the amount of each coating used each day.
  - (C) When non-compliant coatings are used, the daily volume-weighted VOC content shall be calculated using the following equation:

Where:

$$A = \left( \sum C \times U \right) / \left( \sum U \right)$$

A = Volume weighted average (pounds VOC/gallon, less water as applied);

C = VOC content of the coating (pounds VOC/gallon, less water as applied); and

U = Usage rate of the coating (gallons/day).

- (c) Pursuant to 326 IAC 8-1-12(c)(8), the source shall maintain a log for the capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed, including dates and duration of any outages.
- (d) Pursuant to 326 IAC 8-1-12(b)(1)(B), the source shall maintain a copy of the operating parameters and maintenance procedures near the regenerative thermal oxidizer, RTO1, for reference by plant personnel.

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

This rule applies to new facilities as of January 1, 1980, that have potential VOC emissions of twenty-five (25) tons per year or greater if no specific rule in article 8 is applicable. Since the requirements of 326 IAC 8-2-5 (Paper Coating Operations) are applicable to the printing presses, the requirements of 326 IAC 8-1-6 are not applicable.

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

This source consists of lithographic web presses in which one hundred percent (100%) of the paper is coated. Therefore, the three (3) presses (Press #1, Press #2 and Press #3) are subject to the requirements of 326 IAC 8-2-5. Pursuant to this rule, the amount of volatile organic compound (VOC) emissions discharged to the atmosphere, from the printing presses, shall not exceed two and nine tenths (2.9) pounds per gallon, excluding water. The presses will comply with this rule as follows:

- (a) For Heatset Presses (#1 & #3)
  - (1) The regenerative thermal oxidizer shall maintain a minimum operating temperature of 1600°F or the temperature as determined during the latest compliant stack test. The minimum operating temperature shall achieve a destruction efficiency of at least 95%.
  - (2) The worst case coating used at Presses #1 and #3 contains 3.4 pounds of VOC per gallon of coating, less water. This exceeds the limit of 2.9 pounds of VOC per gallon of coating less water. Using the equation from 326 IAC 8-1-2(b), the Equivalent Emission Limit,  $E_a$ , is 6.7 pounds VOC per gallon of coating solids as applied.
  - (3) Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency needed in order to meet the emission limitation in 326 IAC 8-2-5 is 28.56%.
  - (4) The VOC capture system for the heatset lithographic web printing presses has a capture efficiency of 100%. The destruction efficiency, taken from the most recent valid compliant stack test of the regenerative thermal oxidizer, is 99% when operating using a combustion zone temperature of 1,600°F. This is equivalent to an overall control efficiency of 99%. Therefore, Press #1 and Press #3 are able to

comply with the emission limit of 2.9 pounds VOC per gallon of coating, less water under 326 IAC 8-2-5, since the regenerative thermal oxidizer has an overall control efficiency which exceeds the required control efficiency of 28.56%.

(b) For Non-Heatset Press (#2)

- (1) The worst case coating used at the one (1) non-heatset lithographic web printing press (Press #2) has a VOC content of 0.46 pounds VOC per gallon of coating, less water. This is less than 2.9 pounds of VOC per gallon of coating less water limit. Therefore, Press #2 will comply with this rule without using a control device.

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

This rule applies to packaging rotogravure, publication rotogravure or flexographic printing presses. The printing presses at this source are lithographic web presses; therefore, the requirements of 326 IAC 8-5-5 are still not applicable.

There are no other 326 IAC 8 Rules that are applicable to the lithographic printing presses, #1, #2, and #3.

<b>State Rule Applicability - Insignificant Activities</b>
--

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

Pursuant to 326 IAC 1-2-19 an indirect heating source is one which uses the combustion of fuel to produce usable heat that is to be transferred through a heat-conducting materials barrier or by a heat storage medium to a material heated so that the material being heated is not contacted by, and adds no substance to the products of combustion. The natural gas-fired RTO1, the two (2) press dryers, and the one (1) space heater are still not subject to 326 IAC 6-2 because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.

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

This rule applies to particulate emissions from manufacturing processes located anywhere in the state.

- (a) Pursuant to 326 IAC 2-1.1-3(e)(14), the trimming and binding operations are exempt from the requirements of 326 IAC 6-3. In order to comply with this exemption, the dust collection system associated with the trimming and binding equipment shall be in operation at all times that said equipment is in operation.
- (b) The natural gas-fired RTO1, the two (2) press dryers, and the one (1) space heater are still exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

This source is still not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from the natural gas-fired RTO1, the two (2) press dryers, and the one (1) space heater are less than twenty-five (25) tons per year and ten (10) pounds per hour.

<b>Compliance Determination Requirements</b>
--

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

### Testing Requirements

All testing requirements from previous approvals were incorporated into this FESOP. Since compliance with the VOC overall control efficiency specified for the regenerative thermal oxidizer, RTO1, in the FESOP is needed to demonstrate compliance with 326 IAC 2-8 (FESOP), this testing requirement is continued.

- (a) In order to demonstrate compliance with 326 IAC 2-3 (Emission Offset) and 326 IAC 2-8 (FESOP), the Permittee shall perform a Compliance stack test on the regenerative thermal oxidizer (RTO1) to determine the minimum combustion zone temperature that will equal or exceed ninety-five percent (95%) VOC destruction efficiency. This Compliance test must be completed within 60 days after achieving maximum capacity, but no later than 180 days after initial startup.
- (b) This destruction efficiency compliance stack test shall be repeated at least once every five (5) years from the date of most recent valid Compliance demonstration, utilizing EPA Method 25 or 25A or other methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.
- (c) In order to demonstrate compliance with 326 IAC 2-3 (Emission Offset) and 326 IAC 2-8 (FESOP), the Permittee shall perform a Compliance test on the regenerative thermal oxidizer (RTO1) to determine the duct (static) pressure by using an air flow indicator or differential pressure gauge. This Compliance test must be completed within thirty (30) days of a fundamental change, which may be indicated by operating parameters, and may include any of the following:
  - (1) Adding print stations to a press;
  - (2) Changing the duct (static) pressure;
  - (3) Increasing or decreasing the volumetric flow rate (e.g. operational changes or equipment changes such as fans, motors, burners, etc...)
- (d) The VOC capture efficiency compliance test shall be repeated at least once every five (5) years from the date of a valid Compliance demonstration, utilizing EPA Method 204 or other methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.
- (e) The testing requirements applicable to this permit renewal are shown in the following table:

<b>Testing Requirements</b>				
<b>Emission Units</b>	<b>Control Device</b>	<b>Pollutant</b>	<b>Timeframe for Testing</b>	<b>Frequency of Testing</b>
Presses #1 & #3	RTO1	VOC (destruction efficiency)	within 60 days after achieving maximum capacity, but not later than 180 days after initial startup	At least once every 5 years
Presses #1 & #3	RTO1	VOC (capture efficiency)	Within 30 days of a fundamental change	At least once every 5 years

*At the time of this renewal review, the most recent valid compliance demonstration was conducted on August 4, 2004.*

All testing shall be conducted in accordance with Section C - Performance Testing.

<b>Compliance Monitoring Requirements</b>
---

The compliance determination and monitoring requirements applicable to this lithographic web printing source are as follows:

- (1) Particulates [326 IAC 2-1]  
In order to comply with 326 IAC 2-1.1-3, the dry filter for particulate control shall be in operation and control emissions from the trimming and binding operations at all times the binding and finish trimming operations are operating.
  
- (2) VOC Capture System [326 IAC 8-1-2]
  - (a) The Permittee shall determine the duct (static) pressure (or fan amperage) from the most recent compliant stack test and shall establish a normal range of operation.
  
  - (b) On and after the date the approved compliance test results are available, the duct (static) pressure (or fan amperage) shall be maintained within the normal range established from the most recent compliance test.
  
  - (c) Duct (static) pressure (or fan amperage) within the normal range of operation shall demonstrate capture system integrity.
  
  - (d) The duct (static) pressure (or fan amperage) shall be observed at least once per day when the regenerative thermal oxidizer is in operation.
  
- (3) VOC Control Device [326 IAC 8-1-2]
  - (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer, identified as RTO1, for measuring combustion zone temperature. The output 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 regenerative thermal oxidizer (RTO1) at or above the 3-hour average temperature of 1600°F. A 3-hour average temperature that is below 1600°F is not a deviation from this permit, however, failure to take response steps in accordance with Section C - Response to Excursions and Exceedances shall be considered a deviation from this permit.

- (b) The Permittee shall determine the 3-hour average temperature from the most recent compliant stack test. On and after the date the approved stack test results are available, the Permittee shall operate the regenerative thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.
- (c) Pursuant 326 IAC 8-1-12(c)(6)(A)(ii), the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature is more than fifty degrees Fahrenheit (50°F) below the 3-hour average temperature from the most recent compliant stack test. A 3-hour average temperature reading that is more than 50°F below the 3-hour average temperature from the most recent compliant stack test is not a deviation from this permit, however, failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Regenerative Thermal Oxidizer (RTO1)	Duct Static Pressure	Daily	-1.0 to -3.0 inches of water	Response Steps
Regenerative Thermal Oxidizer (RTO1)	Combustion Zone Temperature	3-Hour Average	≥ 1600°F	Response Steps

*Mignone Communications was able to comply at the time the last stack test was performed on August 4, 2004.*

These monitoring conditions are necessary because the regenerative thermal oxidizer must operate properly to ensure compliance with 326 IAC 8-2-5 (Paper Coating Operations), because the dry filters must operate properly to ensure compliance with 326 IAC 2-1.1-3 (Exemptions), and 326 IAC 2-8 (FESOP), and so that the source remains a minor source pursuant to 326 IAC 2-2 (PSD).

The staff recommends to the Commissioner that this FESOP Renewal 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 October 24, 2007. Additional information was received on September 30, 2008.

### Conclusion

Operation of this commercial printing source shall be subject to the conditions of the attached FESOP Renewal No. 069-25446-00059.

**Appendix A: Emission Calculations  
Summary Emission Calculations**

**Company Name: Mignone Communications, Inc.**  
**Address City IN Zip: 880 East State Street, Huntington, Indiana 46750**  
**FESOP Renewal: 069-25446-00059**  
**Reviewer: Sandra Carr**  
**Date: August 12, 2008**

**Summary of Unlimited Potential Emissions**

Emission Unit or Emitting Activity	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	PM <sub>2.5</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	NO <sub>x</sub> (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Cumene (tons/yr)	Xylene (tons/yr)	Glycol Ethers (tons/yr)	PTE Combined HAP (tons/yr)	
Press #1	-	-	-	-	-	303.41	-	0.242	0.302	1.788	2.332	
Press #3	-	-	-	-	-	157.18	-	0.125	0.156	0.93	1.208	460.59
Press #2	-	-	-	-	-	45.76	-	0.502	0.628	3.35	4.476	53
Insignificant Activities	0.20	0.20	0.20	0.02	2.57	0.14	2.16	-	-	-	0.048	
<b>Total</b>	<b>0.20</b>	<b>0.20</b>	<b>0.20</b>	<b>0.02</b>	<b>2.57</b>	<b>506.50</b>	<b>2.16</b>	<b>0.87</b>	<b>1.09</b>	<b>6.06</b>	<b>8.06</b>	

**Summary of Potential Emissions After Limits**

Emission Unit or Emitting Activity	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	PM <sub>2.5</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	NO <sub>x</sub> (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Cumene (tons/yr)	Xylene (tons/yr)	Glycol Ethers (tons/yr)	PTE Combined HAP (tons/yr)	Controlled Combined HAP (tons/yr)	VOC (lb/hr)	Controlled VOC (tons/yr)
Press #1	-	-	-	-	-	-	-	0.001	0.002	0.009	0.012	0.012	0.35	1.52
Press #3	-	-	-	-	-	<99	-	0.001	0.001	0.005	0.006	0.006	0.18	0.79
Press #2	-	-	-	-	-	-	-	0.502	0.628	3.346	4.476	4.476	0.00	0.00
Insignificant Activities	0.20	0.20	0.20	0.02	2.57	0.14	2.16	-	-	-	0.048	0.048		0.141
<b>Total</b>	<b>0.20</b>	<b>0.20</b>	<b>0.20</b>	<b>0.02</b>	<b>2.57</b>	<b>&lt;99.9</b>	<b>2.16</b>	<b>0.50</b>	<b>0.63</b>	<b>3.36</b>	<b>4.54</b>	<b>4.54</b>	<b>0.53</b>	<b>2.45</b>

## Appendix A: Emission Calculations Press Throughput

**Company Name: Mignone Communications, Inc.**  
**Address City IN Zip: 880 East State Street, Huntington, Indiana 46750**  
**FESOP Renewal: 069-25446-00059**  
**Reviewer: Sandra Carr**  
**Date: August 12, 2008**

Press Number	Web Offset Lithographic Press Description	Installation Date	Number of Color Units	Heatset or Non-Heatset	Max Print Width (inches)	Max Press Speed (ft/min)	<sup>(1)</sup> Maximum Hourly Throughput (MMin <sup>2</sup> /hr)	<sup>(2)</sup> Maximum Daily Throughput (MMin <sup>2</sup> /24 hr)	<sup>(2)</sup> Maximum Yearly Throughput (MMin <sup>2</sup> /yr)
Press #1	Goss	1998	5	Heatset	38	1,400	38.30	919.30	335,543
Press #3	Heidelberg	2003	6	Heatset	20	1,378	19.84	476.24	173,826
Press #2	Dauphin Graphics	2001	5	Non-Heatset	35	2,844	71.67	1720.05	627,819

NOTE: Source has agreed to limit the throughput for Press #2 to 750 million square inches per 24 hour day (MMin<sup>2</sup>/24 hr).

### Methodology

<sup>(1)</sup> Maximum Hourly Press Throughput for Web Presses (MMin<sup>2</sup>/hr) = Max Print Width (in) x Max Press Speed (ft/min) x 12 (in/ft) x 60 (min/hr) / 1,000,000 (in<sup>2</sup>/MMin<sup>2</sup>)

<sup>(2)</sup> Maximum Daily Throughput For Web Press (MMin<sup>2</sup>/24 hr) = Maximum Throughput (Mmin<sup>2</sup>/hr) x 24 hr/day

<sup>(2)</sup> Maximum Yearly Throughput For Web Press (MMin<sup>2</sup>/yr) = Maximum Throughput (Mmin<sup>2</sup>/hr) x 8,760 (hr/yr)

<sup>(3)</sup> Limited Press Throughput for Non-Heatset Web Press (#2) = Maximum Daily Throughput (Mmin<sup>2</sup>/24 hr) x 365

### Appendix A: Emission Calculations Press Emission Calculations

**Company Name: Mignone Communications, Inc.**  
**Address City IN Zip: 880 East State Street, Huntington, Indiana 46750**  
**FESOP Renewal: 069-25446-00059**  
**Reviewer: Sandra Carr**  
**Date: August 12, 2008**

Emission Unit ID: Press #1

Press Description: Goss  
Construction Date: 1998

Heatset

**VOC Emissions from Inks and Coatings**

MSDS #	Product Name	Product Type	<sup>(1)</sup> Maximum Coverage (lbs/MMin <sup>2</sup> )	<sup>(2)</sup> VOC Content (wt%)	<sup>(3)</sup> Flash Off (%)	Throughput MMin <sup>2</sup> /Year	Maximum Throughput (lb/hr)	<sup>(4)</sup> Potential VOC Emissions before Control (tpy)	<sup>(5)</sup> Potential VOC Emissions after Control (tpy)
37840	Various Process Color Inks	Ink	4.0	49.7%	80%	335,543	60.86	266.56	1.33
37842	Gloss Overprint Varnish	Coating/Varnish	0.3	42.2%	80%	335,543	3.88	16.99	0.08

**VOC Emissions from Fountain Solution and Press Cleaning**

MSDS #	Product Name	Product Type	<sup>(1)</sup> Maximum Coverage (lbs/MMin <sup>2</sup> )	VOC Content (wt%)	<sup>(3)</sup> Flash Off (%)	Maximum Throughput (lb/hr)	<sup>(4)</sup> Potential VOC Emissions before Control (tpy)	<sup>(5)</sup> Potential VOC Emissions after Control (tpy)
32334	Emerald Premium	Fountain Soln.	0.13	22.5%	100%	1.12	4.91	0.025
19409	Rycoline - Y120WM	Blanket Wash	0.09	99.0%	100%	3.41	14.95	0.075

<b>Press #1</b>	<b>Before</b>	<b>After Control</b>
<b>Total VOC =</b>	303.41	1.52

**HAP Emissions**

MSDS #	Product Name	HAP Constituent	HAP Content (wt%)	Maximum Throughput (lb/hr)	Potential HAP Emissions (tpy)	<sup>(5)</sup> Potential HAP Emissions after Control (tpy)
32334	Emerald Premium	Glycol Ethers	8.2%	10.05	1.79	0.0089
19409	Rycoline - Y120WM	Xylene	2.00%	2.45	0.30	0.0015
		Cumene	1.60%	1.96	0.24	0.0012

<b>Combined HAP =</b>	<b>Before</b>	<b>After Control</b>
	2.33	0.0117

**Methodology**

- <sup>(1)</sup> Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners are typical max usages for these types of presses
- <sup>(2)</sup> VOC Content (wt%) is determined from the MSDS for the "worst case" product within the product type used on the identified press
- <sup>(3)</sup> Flash off % is determined from the EPA document "Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing" (EPA 453/R-06-002, September 2006).
- <sup>(4)</sup> VOC PTE from Inks, Fountain Solutions, and Press Cleaners (tpy) = Maximum Coverage x VOC Content (wt%) x Flash Off % x Throughput x 1 ton/2000 pounds
- <sup>(5)</sup> VOC PTE from Inks, Fountain Solutions, and Press Cleaners (tpy) = Maximum Coverage x VOC Content (wt%) x Flash Off % x Throughput x 1 ton/2000 pounds x Control Efficiency (99%)

### Appendix A: Emission Calculations Press Emission Calculations

**Company Name: Mignone Communications, Inc.**  
**Address City IN Zip: 880 East State Street, Huntington, Indiana 46750**  
**FESOP Renewal: 069-25446-00059**  
**Reviewer: Sandra Carr**  
**Date: August 12, 2008**

Emission Unit ID: Press #2

Press Description: Dauphin Graphics  
Construction Date: 2001

Non-Heatset

**VOC Emissions from Inks and Coatings**

MSDS #	Product Name	Product Type	<sup>(1)</sup> Maximum Coverage (lbs/MMin <sup>2</sup> )	<sup>(2)</sup> VOC Content (wt%)	<sup>(3)</sup> Flash Off (%)	Maximum Throughput MMin <sup>2</sup> /Year	Maximum Throughput (lb/hr)	<sup>(4)</sup> Potential VOC Emissions (tpy)	VOC Content (lb VOC/ gal coating less water)
37839	Various NonHeatset Color Inks	Ink	3.5	10.0%	5%	627,819	1.25	5.49	0.46

**VOC Emissions from Fountain Solution and Press Cleaning**

MSDS #	Product Name	Product Type	<sup>(1)</sup> Maximum Coverage (lbs/MMin <sup>2</sup> )	VOC Content (wt%)	<sup>(3)</sup> Flash Off (%)	Maximum Throughput (lb/hr)	<sup>(4)</sup> Potential VOC Emissions (tpy)
32334	Emerald Premium	Fountain Soln.	0.13	22.5%	100%	2.10	9.19
19409	Rycoline - Y120WM	Blanket Wash	0.10	99.0%	100%	7.10	31.08

<b>Press #2 Total VOC = 45.76</b>
---------------------------------------

**HAP Emissions**

MSDS #	Product Name	HAP Constituent	HAP Content (wt%)	Maximum Throughput (lb/hr)	Potential HAP Emissions (tpy)
32334	Emerald Premium	Glycol Ethers	8.2%	0.76	3.35
19409	Rycoline - Y120WM	Xylene	2.00%	0.14	0.63
		Cumene	1.60%	0.11	0.50

<b>Combined HAP = 4.48</b>
----------------------------

NOTE: Source has agreed to limit the throughput for Press #2 to 750 million square inches per 24 hour day (MMin<sup>2</sup>/24 hr).**Methodology**

- <sup>(1)</sup> Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners are typical max usages for these types of presses
- <sup>(2)</sup> VOC Content (wt%) is determined from the MSDS for the "worst case" product within the product type used on the identified press
- <sup>(3)</sup> Flash off % is determined from the EPA document "Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing" (EPA 453/R-06-002, September 2006).
- <sup>(4)</sup> VOC PTE from Inks, Fountain Solutions, and Press Cleaners (tpy) = Maximum Coverage x VOC Content (wt%) x Flash Off % x Throughput x 1 ton/2000 pounds
- <sup>(5)</sup> VOC PTE from Inks, Fountain Solutions, and Press Cleaners (tpy) = Maximum Coverage x VOC Content (wt%) x Flash Off % x Throughput x 1 ton/2000 pounds x Control Efficiency (99%)
- <sup>(6)</sup> Limited VOC Emissions = Limited Throughput x Maximum Coverage x VOC Content (wt%) x Flash Off % x 1 ton/2000 pounds

**Appendix A: Emission Calculations  
Press Emission Calculations**

**Company Name: Mignone Communications, Inc.  
Address City IN Zip: 880 East State Street, Huntington, Indiana 46750  
FESOP Renewal: 069-25446-00059  
Reviewer: Sandra Carr  
Date: August 12, 2008**

Emission Unit ID: Press #3

**Press Description: Heidelberg  
Construction Date: 2004**

Heatset

**VOC Emissions from Inks and Coatings**

MSDS #	Product Name	Product Type	<sup>(1)</sup> Maximum Coverage (lbs/MMin <sup>2</sup> )	<sup>(2)</sup> VOC Content (wt%)	<sup>(3)</sup> Flash Off (%)	Throughput MMin <sup>2</sup> /Year	Maximum Throughput (lb/hr)	<sup>(4)</sup> Potential VOC Emissions before Control (tpy)	<sup>(5)</sup> Potential VOC Emissions after Control (tpy)
37840	Various Process Color Inks	Ink	4.0	49.7%	80%	173,826	31.5	138.09	0.69
37842	Gloss Overprint Varnish	Coating/Varnish	0.3	42.2%	80%	173,826	2.0	8.80	0.04

**VOC Emissions from Fountain Solution and Press Cleaning**

MSDS #	Product Name	Product Type	<sup>(1)</sup> Maximum Coverage (lbs/MMin <sup>2</sup> )	VOC Content (wt%)	<sup>(3)</sup> Flash Off (%)	Maximum Throughput (lb/hr)	<sup>(4)</sup> Potential VOC Emissions before Control (tpy)	<sup>(5)</sup> Potential VOC Emissions after Control (tpy)
32334	Emerald Premium	Fountain Soln.	0.13	22.5%	100%	0.58	2.55	0.01
19409	Rycoline - Y120WM	Blanket Wash	0.09	99.0%	100%	1.77	7.74	0.04

<b>Press #3</b>	<b>Before</b>	<b>After Control</b>
<b>Total VOC =</b>	<b>157.18</b>	<b>0.79</b>

**HAP Emissions**

MSDS #	Product Name	HAP Constituent	HAP Content (wt%)	Maximum Throughput (lb/hr)	Potential HAP Emissions (tpy)	<sup>(5)</sup> Potential HAP Emissions after Control (tpy)
32334	Emerald Premium	Glycol Ethers	8.2%	0.21	0.93	0.0046
19409	Rycoline - Y120WM	Xylene	2.00%	0.04	0.16	0.0008
		Cumene	1.60%	0.03	0.13	0.0006

<b>Combined HAP =</b>	<b>Before</b>	<b>After Control</b>
	<b>1.21</b>	<b>0.0060</b>

**Methodology**

- <sup>(1)</sup> Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners are typical max usages for these types of presses
- <sup>(2)</sup> VOC Content (wt%) is determined from the MSDS for the "worst case" product within the product type used on the identified press
- <sup>(3)</sup> Flash off % is determined from the EPA document "Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing" (EPA 453/R-06-002, September 2006).
- <sup>(4)</sup> VOC PTE from Inks, Fountain Solutions, and Press Cleaners (tpy) = Maximum Coverage x VOC Content (wt%) x Flash Off % x Throughput x 1 ton/2000 pounds
- <sup>(5)</sup> VOC PTE from Inks, Fountain Solutions, and Press Cleaners (tpy) = Maximum Coverage x VOC Content (wt%) x Flash Off % x Throughput x 1 ton/2000 pounds x Control Efficiency (99%)

**Appendix A: Emission Calculations  
Combustion Emission Calculations**

**Company Name: Mignone Communications, Inc.**  
**Address City IN Zip: 880 East State Street, Huntington, Indiana 46750**  
**FESOP Renewal: 069-25446-00059**  
**Reviewer: Sandra Carr**  
**Date: August 12, 2008**

**Natural Gas Fired Unit Specifications**

Unit Descriptions	Maximum Heat Input Capacity Per Unit [MMBtu/hr]	Number of Units	Maximum Heat Input Capacity [MMBtu/hr]	Maximum Potential Natural Gas Usage [scf/hr] <sup>(1)</sup>
Press #1 Drying Oven	2.42	1	2.42	2,373
Press #3 Drying Oven	1.13	1	1.13	1,108
RTO	2.30	1	2.30	2,255
Space Heater	0.13	1	0.13	127
<b>TOTAL</b>		<b>4</b>	<b>5.98</b>	<b>5,863</b>

**Natural Gas Fired Unit Potential Emissions**

Pollutant	Emission Factor [lb/MMscf] <sup>(2)</sup>	Potential Emissions [lb/hr] <sup>(3)</sup>	Total Potential Emissions [tpy] <sup>(4)</sup>	Dryer #1 (lb/hr) <sup>(3)</sup>	Dryer #1 (tpy)	Dryer #3 (lb/hr) <sup>(3)</sup>	Dryer #3 (tpy)	Insignificant Activities (lb/hr) <sup>(3)</sup>	Insignificant Activities (tpy)
PM/PM <sub>10</sub>	7.6	0.04	0.20	1.80E-02	0.079	8.42E-03	0.037	1.81E-02	7.93E-02
SO <sub>2</sub>	0.6	0.00	0.02	1.42E-03	0.006	6.65E-04	0.003	1.43E-03	6.26E-03
NO <sub>x</sub>	100	0.59	2.57	2.37E-01	1.039	1.11E-01	0.485	2.38E-01	1.04E+00
VOC	5.5	0.03	0.14	1.30E-02	0.057	6.09E-03	0.027	1.31E-02	5.74E-02
CO	84	0.49	2.16	1.99E-01	0.873	9.31E-02	0.408	2.00E-01	8.77E-01
Benzene	2.10E-03	1.23E-05	5.39E-05	4.98E-06	2.18E-05	2.33E-06	1.02E-05	5.00E-06	2.19E-05
Dichlorobenzene	1.20E-03	7.04E-06	3.08E-05	2.85E-06	1.25E-05	1.33E-06	5.82E-06	2.86E-06	1.25E-05
Formaldehyde	7.50E-02	4.40E-04	1.93E-03	1.78E-04	7.79E-04	8.31E-05	3.64E-04	1.79E-04	7.83E-04
Hexane	1.80E+00	1.06E-02	4.62E-02	4.27E-03	1.87E-02	1.99E-03	8.73E-03	4.29E-03	1.88E-02
Toluene	3.40E-03	1.99E-05	8.73E-05	8.07E-06	3.53E-05	3.77E-06	1.65E-05	8.10E-06	3.55E-05
Lead	5.00E-04	2.93E-06	1.28E-05	1.19E-06	5.20E-06	5.54E-07	2.43E-06	1.19E-06	5.22E-06
Cadmium	1.10E-03	6.45E-06	2.82E-05	2.61E-06	1.14E-05	1.22E-06	5.34E-06	2.62E-06	1.15E-05
Chromium	1.40E-03	8.21E-06	3.60E-05	3.32E-06	1.45E-05	1.55E-06	6.79E-06	3.34E-06	1.46E-05
Manganese	3.80E-04	2.23E-06	9.76E-06	9.02E-07	3.95E-06	4.21E-07	1.84E-06	9.05E-07	3.97E-06
Nickel	2.10E-03	1.23E-05	5.39E-05	4.98E-06	2.18E-05	2.33E-06	1.02E-05	5.00E-06	2.19E-05
<b>Combined HAPs</b>	NA	0.011	<b>0.048</b>		<b>0.020</b>		<b>0.009</b>		<b>0.020</b>

**Notes and Methodology**

(1) Maximum Potential Natural Gas Usage [scf/hr] = Combined Maximum Heat Input Capacity [MMBtu/hr] x 1,000,000 Btu/MMBtu / 1,020 Btu/scf

Assumed heating value of natural gas to be 1,020 Btu/scf.

(2) Emission factors are from AP-42, Tables 1.4-1 and 1.4-2. Utilized the NO<sub>x</sub> and CO emission factors for an uncontrolled small boiler (i.e. < 100 MMBtu/hr heat input).

All emission factors are for normal firing. The PM/PM<sub>10</sub> emission factor is filterable and condensable particulate combined.

The HAPs above include the 5 organic HAPs and 5 metal HAPs with the highest emission factors.

(3) Potential Emissions [lb/hr] = Total Potential Natural Gas Usage [scf/hr] / 1,000,000 scf/MMscf x Emission Factor [lb/MMscf]

(4) Combined Potential Emissions [tpy] = Potential Emissions [lb/hr] x 8,760 hr/yr / 2,000 lb/ton