



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

TO: Interested Parties / Applicant

DATE: July 15, 2009

RE: JTS Direct, LLC dba doodad / 011-27431-00026

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



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**JTS Direct, LLC dba doodad
720 Ransdell Road
Lebanon, Indiana 46052**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any 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.: F011-27431-00026	
Issued by:  Alfred C. Dumaul, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: July 15, 2009 Expiration Date: July 15, 2019

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	720 Ransdell Road, Lebanon, Indiana 46052
Mailing Address:	P.O. Box 772, Lebanon, Indiana 46052
General Source Phone Number:	(765) 485-2789; (262) 369-9500
SIC Code:	2752
County Location:	Boone
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) heatset half web press and dryer, identified as Web 8, with a maximum line speed of 1260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as Catalytic Oxidizer #1R, as control, and exhausting to Stack 1. The press was constructed in 1993 and the catalytic oxidizer was constructed in 2007.
- (b) One (1) heatset web press and dryer, identified as M-1000, with a maximum line speed of 1260 feet per minute and a maximum print width of 38 inches with associated in-line equipment, using a catalytic oxidizer, identified as Catalytic Oxidizer #2, as control, and exhausting to Stack 2. Both the press and the catalytic oxidizer were constructed in 1999.

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

This stationary source also includes the following insignificant activities:

- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour.
 - (1) One (1) natural gas-fired boiler, attached to Web 8, with a maximum capacity of 2.5 million British thermal units per hour (MMBtu/hr), constructed in September 2007, using a catalytic oxidizer, identified as Catalytic Oxidizer #1R, as control, and exhausting to Stack 1. [326 IAC 6-2-4]
 - (2) One (1) natural gas-fired boiler, attached to M-1000, with a maximum capacity of 8.64 million British thermal units per hour (MMBtu/hr), constructed in 1992, using a catalytic oxidizer, identified as Catalytic Oxidizer #2, as control, and exhausting to Stack 2. [326 IAC 6-2-4]

(d) Four (4) trimmers.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F011-27431-00026, 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][IC 13-17-12]

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 and Enforcement 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 and Enforcement Branch), or

Telephone Number: 317-233-0178 (ask for Compliance and Enforcement
Branch)

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 and Enforcement 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. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "authorized individual" need only referenced by the date of the original report.

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

- (a) All terms and conditions of permits established prior to F011-27431-00026 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 and Enforcement Branch, 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
Permit Administration and Support Section, 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
Permit Administration and Support Section, 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
Permit Administration and Support Section, 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.

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
Permit Administration and Support Section, 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) Pursuant to 326 IAC 2-2 (PSD), 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.

(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 demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue

MC 61-53 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 and Enforcement Branch, 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 within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later. 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 and Enforcement 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 or ninety (90) days of initial start-up, whichever is later.

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 and Enforcement Branch, 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) heatset half web press and dryer, identified as Web 8, with a maximum line speed of 1260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as Catalytic Oxidizer #1R, as control, and exhausting to Stack 1. The press was constructed in 1993 and the catalytic oxidizer was constructed in 2007.
- (b) One (1) heatset web press and dryer, identified as M-1000, with a maximum line speed of 1260 feet per minute and a maximum print width of 38 inches with associated in-line equipment, using a catalytic oxidizer, identified as Catalytic Oxidizer #2, as control, and exhausting to Stack 2. Both the press and the catalytic oxidizer were constructed in 1999.

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

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

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

The total VOC input to the one (1) heatset half web press and dryer, identified as Web 8, and the one (1) heatset web press and dryer, identified as M-1000, shall be restricted such that the total VOC emissions from these two (2) facilities shall not exceed ninety-nine (99) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, based on 80% flash off and overall VOC control efficiency of the catalytic oxidizers, identified as Catalytic Oxidizer #1R and Catalytic Oxidizer #2, as determined by the most recent compliant stack test.

This limits the source-wide potential to emit VOC to less than 100 tons per twelve (12) consecutive month period. Compliance with this limit will satisfy 326 IAC 2-8-4 (FESOP) and will render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.2 Best Available Control Technology (BACT) - VOC [326 IAC 8-1-6]

Pursuant to CP 011-2057-00026, issued on January 6, 1993, 326 IAC 8-1-6 (BACT), and revised in FESOP No. F011-11070-00026, issued on October 6, 1999, and Significant Permit Revision No. 011-24345-00026, issued on June 29, 2007, the Permittee shall comply with the following BACT requirements:

- (a) The two (2) natural gas-fired catalytic oxidizers, identified as Catalytic Oxidizer #1R and Catalytic Oxidizer #2, shall operate with a minimum temperature of 650°F and 550°F, respectively, or a temperature established during the latest stack test.
- (b) Catalytic Oxidizer #1R shall have a capture efficiency of at least 75% combined with a destruction efficiency of 95%, to ensure an overall control efficiency of at least 68%.
- (c) Catalytic Oxidizer #2 shall have a capture efficiency of 100% and a control efficiency of 95%.

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

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

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

D.1.5 VOC Control

In order to comply with conditions D.1.1 and D.1.2,

- (a) the capture system and Catalytic Oxidizer #1R for VOC control shall be in operation and control emissions from Web 8 at all times Web 8 is in operation; and
- (b) the capture system and Catalytic Oxidizer #2 for VOC control shall be in operation and control emissions from M-1000 at all times M-1000 is in operation.

D.1.6 VOC Emissions

Compliance with condition D.1.1 shall be determined within thirty (30) days of the end of each month. This shall be based on the total volatile organic compound usage for Web 8 and M-1000 for the previous month added to the total VOC usage for Web 8 and M-1000 during the previous 11 months, so as to arrive at VOC emissions for the most recent 12 consecutive month period. Monthly VOC emissions from Catalytic Oxidizer #1R and Catalytic Oxidizer #2 can be calculated using the following VOC equation:

VOC emitted = VOC input x flash-off factor (80%) x [1 - overall control efficiency (determined from the most recent compliant stack test)]

D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

In order to demonstrate compliance with conditions D.1.1 and D.1.2, the Permittee shall perform VOC (including emission rate, destruction efficiency, and capture efficiency) testing for Catalytic Oxidizer #1R and Catalytic Oxidizer #2 within five (5) years from the last valid compliance demonstration, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.1.8 Catalytic Oxidizer Temperature and Air Flow Rate

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on each of the catalytic oxidizers for measuring the operating temperature and air flow rate of each catalytic oxidizer. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. The Permittee shall operate both Catalytic Oxidizer #1R and #2 at or above the 3-hour average temperature of 650°F and the minimum air flow rate shall be maintained at 1931 acfm and 2271 acfm, respectively.
- (b) The Permittee shall determine the 3-hour average temperature and air flow rate from the most recent valid stack test that demonstrates compliance with the limits in condition D.1.2.
- (c) On and after the date the stack test results are available, the Permittee shall operate the catalytic oxidizers at or above the 3-hour average temperature and minimum air flow rate as observed during the most recent compliant stack test.

D.1.9 Parametric Monitoring

- (a) The duct pressure or fan amperage shall be observed at least once per day when Web 8 or M-1000 is in operation.
- (b) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the limits in condition D.1.2.
- (c) On and after the date that the stack test results are available for each catalytic oxidizer, the duct pressure or fan amperage shall be maintained within the normal range as observed during the most recent compliant stack test.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with conditions D.1.1 and D.1.6, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly or as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.1.
 - (1) The quantity of VOC-containing material used, including purchase orders, invoices, and material safety data sheets (MSDS) or other supplier documentation necessary to verify the type and amount used.
 - (2) The VOC content of each coating material and solvent used.
 - (3) The weight of VOCs emitted for each compliance period, considering capture and control efficiencies.
 - (4) The following operation parameters of each catalytic oxidizer:
 - (A) VOC capture efficiency;
 - (B) VOC destruction efficiency;
 - (C) A description of the data used to establish the capture and destruction efficiencies; and
 - (D) Continuous temperature readings.
 - (5) Continuous air flow rate readings.
- (b) To document compliance with condition D.1.8, the Permittee shall maintain records of the continuous temperature records (reduced to 3-hour block averages) and air flow rates for the catalytic oxidizers and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (c) To document compliance with condition D.1.9, the Permittee shall maintain a daily record of the duct pressure or fan amperage and the duct pressure or fan amperage used to demonstrate compliance during the most recent compliant stack test. The Permittee shall include in its daily record when a duct pressure or fan amperage record is not taken and the reason for the lack of duct pressure or fan amperage record (e.g., the process did not operate that day).

D.1.11 Reporting Requirements

To document compliance with condition D.1.1, a quarterly summary of the total VOC input to Web 8 and M-1000 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour.
- (1) One (1) natural gas-fired boiler, attached to Web 8, with a maximum capacity of 2.5 million British thermal units per hour (MMBtu/hr), constructed in September 2007, using a catalytic oxidizer, identified as Catalytic Oxidizer #1R, as control, and exhausting to Stack 1. [326 IAC 6-2-4]
- (2) One (1) natural gas-fired boiler, attached to M-1000, with a maximum capacity of 8.64 million British thermal units per hour (MMBtu/hr), constructed in 1992, using a catalytic oxidizer, identified as Catalytic Oxidizer #2, as control, and exhausting to Stack 2. [326 IAC 6-2-4]

(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.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating), the particulate emissions from each of the two (2) natural gas-fired boilers, attached to M-1000 and Web 8, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

The particulate emissions from each of the two (2) natural gas-fired boilers shall not exceed 0.56 pounds of particulate per MMBtu.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: JTS Direct, LLC dba doodad
Source Address: 720 Ransdell Road, Lebanon, Indiana 46052
Mailing Address: P.O. Box 772, Lebanon, Indiana 46052
FESOP Permit No.: F011-27431-00026

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT 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: JTS Direct, LLC dba doodad
Source Address: 720 Ransdell Road, Lebanon, Indiana 46052
Mailing Address: P.O. Box 772, Lebanon, Indiana 46052
FESOP Permit No.: F011-27431-00026

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">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: JTS Direct, LLC dba doodad
 Source Address: 720 Ransdell Road, Lebanon, Indiana 46052
 Mailing Address: P.O. Box 772, Lebanon, Indiana 46052
 FESOP Permit No.: F011-27431-00026
 Facility: Web 8 and M-1000
 Parameter: VOC emissions
 Limit: The total VOC input to the one (1) heatset half web press and dryer, identified as Web 8, and the one (1) heatset web press and dryer, identified as M-1000, shall be restricted such that the total VOC emissions from these two (2) facilities shall not exceed ninety-nine (99) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, based on 80% flash off and overall VOC control efficiency of the catalytic oxidizers, identified as Catalytic Oxidizer #1R and Catalytic Oxidizer #2, as determined by the most recent compliant stack test.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

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

Source Name: JTS Direct, LLC dba doodad
Source Address: 720 Ransdell Road, Lebanon, Indiana 46052
Mailing Address: P.O. Box 772, Lebanon, Indiana 46052
FESOP Permit No.: F011-27431-00026

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Background and Description

Source Name:	JTS Direct, LLC dba doodad
Source Location:	720 Ransdell Road, Lebanon, IN 46052
County:	Boone
SIC Code:	2752
Operation Permit No.:	F011-27431-00026
Permit Reviewer:	Meredith W. Jones

On June 5, 2009, the Office of Air Quality (OAQ) had a notice published in the Lebanon Reporter, Lebanon, Indiana, stating that JTS Direct, LLC dba doodad had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal for a stationary heatset web offset printing press operation. The notice also stated that the OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added.

Changes

IDEM, OAQ is revising Section B - Emergency Provisions to allow the Permittee to reference a previously reported emergency under paragraph (b)(5) in the Quarterly Deviation and Compliance Monitoring Report.

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

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. **Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "authorized individual" need only referenced by the date of the original report.**

IDEM Contact

- (a) Questions regarding this proposed Part 70 Operating Permit Renewal can be directed to Meredith Jones at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5176 or toll free at 1-800-451-6027 extension 4-5176.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

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

Source Name:	JTS Direct, LLC dba doodad
Source Location:	720 Ransdell Road, Lebanon, IN 46052
County:	Boone
SIC Code:	2752
Permit Renewal No.:	F011-27431-00026
Permit Reviewer:	Meredith W. Jones

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from JTS Direct, LLC dba doodad relating to the operation of a stationary heatset web offset printing press operation.

History

On January 30, 2009, JTS Direct, LLC dba doodad submitted an application to the OAQ requesting to renew its operating permit. JTS Direct, LLC dba doodad was issued FESOP Renewal No. F011-18412-00026 on November 23, 2004.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) heatset half web press and dryer, identified as Web 8, with a maximum line speed of 1260 feet per minute and a maximum print width of 20 inches with associated in-line equipment, using a catalytic oxidizer, identified as Catalytic Oxidizer #1R, as control, and exhausting to Stack 1. The press was constructed in 1993 and the catalytic oxidizer was constructed in 2007.
- (b) One (1) heatset web press and dryer, identified as M-1000, with a maximum line speed of 1260 feet per minute and a maximum print width of 38 inches with associated in-line equipment, using a catalytic oxidizer, identified as Catalytic Oxidizer #2, as control, and exhausting to Stack 2. Both the press and the catalytic oxidizer were constructed in 1999.

Insignificant Activities

- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour.
 - (1) One (1) natural gas-fired boiler, attached to Web 8, with a maximum capacity of 2.5 million British thermal units per hour (MMBtu/hr), constructed in September 2007, using a catalytic oxidizer, identified as Catalytic Oxidizer #1R, as control, and exhausting to Stack 1. [326 IAC 6-2-4]
 - (2) One (1) natural gas-fired boiler, attached to M-1000, with a maximum capacity of 8.64 million British thermal units per hour (MMBtu/hr), constructed in 1992, using a catalytic oxidizer, identified as Catalytic Oxidizer #2, as control, and exhausting to Stack 2. [326 IAC 6-2-4]
- (d) Four (4) trimmers.

Existing Approvals

Since the issuance of FESOP Renewal No. F011-18412-00026 on November 23, 2004, the source has constructed or has been operating under the following approvals as well:

- (a) First Administrative Amendment No. 011-21248-00026, issued on June 29, 2005.
- (b) Significant Permit Revision No. 011-24345-00026, issued on June 29, 2007.

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

The following terms and conditions from previous approvals have been revised in this FESOP Renewal:

- (a) Catalytic Oxidizers Compliance Monitoring Requirements

IDEM, OAQ is revising conditions D.1.8 and D.1.9 to increase clarity. The Permittee will begin monitoring against the new set point or range as soon as the valid compliant results are available.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Boone County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective October 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ 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 _{2.5} .	

- (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 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 Counties as attainment for the 8-hour ozone standard.
- (3) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Boone County has been designated as attainment or unclassifiable for ozone.

Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) *PM_{2.5}*
Boone County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions, and the effective date of these rules was July 15, 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 PM₁₀ emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.
- (c) *Other Criteria Pollutants*
Boone County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) *Fugitive Emissions*
Because 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 and there is not an applicable New Source Performance Standard that was in effect on August 7, 1980, 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 the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants is less than 100 tons per year, each.
- (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 HAPs 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

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

Process (Emission Unit)	Potential To Emit (tons/year)							
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	HAPs: worst single
Printing Presses (Web 8, M-1000, & Miscellaneous Processes)	-	-	-	-	≤99.0 ¹	-	-	0.74 (Ethylene Glycol)
Catalytic Oxidizers (#1R & #2)	negl.	negl.	negl.	negl.	negl.	0.52	0.61	negl.
Boilers (2 units)	negl.	0.37	0.37	negl.	0.27	4.10	4.88	negl.
Total Emissions	0.10	0.42	0.42	negl.	≤99.3	4.62	5.49	0.74 (Ethylene Glycol); 1.2 (total)

¹Limited pursuant to 2-8-4 (FESOP)

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year 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 applicability.

Federal Rule Applicability

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards (NSPS) for the Graphic Arts Industry: Publication Rotogravure Printing (40 CFR 60, Subpart QQ) (326 IAC 12) are not included in the permit because the printing presses at the source are web presses, not rotogravure printing presses.
- (b) The requirements of the New Source Performance Standards (NSPS) for Flexible Vinyl and Urethane Coating and Printing Source (40 CFR 60, Subpart FFF) (326 IAC 12) are not included in the permit because this source does not have any rotogravure printing lines.
- (c) The requirements of the New Source Performance Standards (NSPS) for Polymeric Coating of Supporting Substrates Facilities (40 CFR 60, Subpart VVV) (326 IAC 12) are not included in the permit because this source only applies coatings to paper.
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry (40 CFR 63, Subpart KK) (326 IAC 20-18) are not included in the permit because the source is not a major source of hazardous air

pollutants (HAPs) and neither publication rotogravure, product and packaging rotogravure, nor wide-web flexographic printing presses are operated at the source.

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paper and Other Web Coating (40 CFR 63, Subpart JJJJ) (326 IAC 20-65) are not included in the permit because the source is not a major source of hazardous air pollutants (HAPs).
- (g) The requirements of the Emission Standards for Hazardous Air Pollutants (NESHAP): Printing, Coating, and Dyeing of Fabrics and Other Textiles (40 CFR 63, Subpart OOOO) (326 IAC 20-77) are not included in the permit because this source is not a major source of hazardous air pollutants (HAPs) and it does not print, coat, slash, dye or finish fabric or other textiles.
- (h) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit for this source.

Compliance Assurance Monitoring (CAM)

- (i) 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 limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

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

The source is subject to 326 IAC 1-6-3.

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

This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

The total VOC input to the one (1) heatset half web press and dryer, identified as Web 8, and the one (1) heatset web press and dryer, identified as M-1000, shall be restricted such that the total VOC emissions from these two (2) facilities shall not exceed ninety-nine (99) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, based on 80% flash off and overall VOC control efficiency of the catalytic oxidizers, identified as Catalytic Oxidizer #1R and Catalytic Oxidizer #2, as determined by the most recent compliant stack test.

This limits the source-wide potential to emit VOC to less than 100 tons per twelve (12) consecutive month period. Compliance with this limit will satisfy 326 IAC 2-8-4 (FESOP) and will render the requirements of 326 IAC 2-7 (Part 70) 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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Individual Facilities

Printing Operations

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

The requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) do not apply to Web 8 or M-1000 because both of these manufacturing processes have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

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

Pursuant to CP 011-2057-00026, issued on January 6, 1993, 326 IAC 8-1-6 (BACT), and revised in FESOP No. F011-11070-00026, issued on October 6, 1999, and Significant Permit Revision No. 011-24345-00026, issued on June 29, 2007, the Permittee shall comply with the following BACT requirements:

- (a) The two (2) natural gas-fired catalytic oxidizers, identified as Catalytic Oxidizer #1R and Catalytic Oxidizer #2, shall operate with a minimum temperature of 650°F and 550°F, respectively, or a temperature established during the latest stack test.
- (b) Catalytic Oxidizer #1R shall have a capture efficiency of at least 75% combined with a destruction efficiency of 95%, to ensure an overall control efficiency of at least 68%.
- (c) Catalytic Oxidizer #2 shall have a capture efficiency of 100% and a control efficiency of 95%.

Pursuant to Significant Permit Revision No. 011-24345-00026, issued on June 29, 2007, the replacement of Catalytic Oxidizer #1 with Catalytic Oxidizer #1R satisfies the BACT requirements for Web 8 and Catalytic Oxidizer #1. Proper operation of the capture system and catalytic incinerator shall constitute BACT for this press and shall be deemed to satisfy the requirements of CP 011-2057-00026 and 326 IAC 8-1-6. As of the stack test performed on September 12, 2007, both Catalytic Oxidizer #1R and Catalytic Oxidizer #2 shall operate at a minimum temperature of 650°F to allow for at least 95% destruction of captured VOC. Pursuant to 326 IAC 8-1-6, Catalytic Oxidizers #1R and #2 shall have the minimum air flow rate maintained at 1440 acfm and 3240 acfm,

respectively, or an air flow rate established during the latest stack test. Operation at or above this minimum air flow ensures compliance with the BACT requirements of 326 IAC 8-1-6. As of the stack test performed on September 12, 2007, Catalytic Oxidizers #1R and #2 shall have the minimum air flow rate maintained at 1931 acfm and 2271 acfm, respectively.

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

Both of the printing presses at the source were constructed prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-2-5 do not apply.

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

The printing presses at the source are not packaging rotogravure, publication rotogravure, or flexographic printing sources. Therefore, the requirements of 326 IAC 8-5-5 do not apply.

Boilers

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

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating), the particulate emissions from each of the two (2) natural gas-fired boilers, attached to Web 8 and M-1000, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

- Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
- Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

$$Pt = \frac{1.09}{(12.54)^{0.26}} = 0.56 \text{ lb/MMBtu}$$

The potential particulate emissions from each of the boilers is 0.00009 lb/MMBtu. Therefore, both of the boilers are able to comply with this limit.

Trimmers

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

The requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) do not apply to the four (4) trimmers because each of these manufacturing processes have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Compliance Determination and Monitoring Requirements

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.

Compliance Determination Requirements

The compliance determination requirements applicable to this source are as follows:

(a) *VOC Control*

In order to ensure compliance with 326 IAC 2-8-4 (FESOP) and 326 IAC 8-1-6 (BACT) and to render the requirements of 326 IAC 2-7 (Part 70) not applicable:

- (1) the capture system and Catalytic Oxidizer #1R for VOC control shall be in operation and control emissions from Web 8 at all times Web 8 is in operation; and
- (2) the capture system and Catalytic Oxidizer #2 for VOC control shall be in operation and control emissions from M-1000 at all times M-1000 is in operation.

(b) *VOC Emissions*

Compliance with condition D.1.1 shall be determined within thirty (30) days of the end of each month. This shall be based on the total volatile organic compound usage for Web 8 and M-1000 for the previous month added to the total VOC usage for Web 8 and M-1000 during the previous 11 months, so as to arrive at VOC emissions for the most recent 12 consecutive month period. Monthly VOC emissions from Catalytic Oxidizer #1R and Catalytic Oxidizer #2 can be calculated using the following VOC equation:

VOC emitted = VOC input x flash-off factor (80%) x [1 - overall control efficiency (determined from the most recent compliant stack test)]

This requirement is necessary to ensure compliance with 326 IAC 2-8-4 (FESOP) and to render the requirements of 326 IAC 2-7 (Part 70) not applicable.

(c) *Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]*

In order to demonstrate compliance with conditions D.1.1 and D.1.2, the Permittee shall perform VOC (including emission rate, destruction efficiency, and capture efficiency) testing for Catalytic Oxidizer #1R and Catalytic Oxidizer #2 within five (5) years from the last valid compliance demonstration, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

These requirements are necessary to ensure compliance with 326 IAC 2-8-4 (FESOP) and 326 IAC 8-1-6 (BACT) and to render the requirements of 326 IAC 2-7 (Part 70) not applicable.

Compliance Monitoring Requirements

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

(a) *Catalytic Oxidizer Temperature and Air Flow Rate*

- (1) A continuous monitoring system shall be calibrated, maintained, and operated on each of the catalytic oxidizers for measuring the operating temperature and air flow rate of each catalytic oxidizer. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. The Permittee shall operate both Catalytic Oxidizer #1R and #2 at or above the 3-hour average temperature of 650°F and the minimum air flow rate shall be maintained at 1931 acfm and 2271 acfm, respectively.

- (2) The Permittee shall determine the 3-hour average temperature and air flow rate from the most recent valid stack test that demonstrates compliance with the limits in condition D.1.2.
- (3) On and after the date the stack test results are available, the Permittee shall operate the catalytic oxidizers at or above the 3-hour average temperature and minimum air flow rate as observed during the most recent compliant stack test.

These monitoring conditions are necessary because the catalytic oxidizers for the web presses must operate properly to ensure compliance with 326 IAC 8-1-6 (BACT) and 326 IAC 2-8 (FESOP).

(b) *Parametric Monitoring*

- (1) The duct pressure or fan amperage shall be observed at least once per day when Web 8 or M-1000 is in operation.
- (2) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the limits in condition D.1.2.
- (3) On and after the date that the stack test results are available for each catalytic oxidizer, the duct pressure or fan amperage shall be maintained within the normal range as observed during the most recent compliant stack test.

These monitoring conditions are necessary because the catalytic oxidizers for the web presses must operate properly to ensure compliance with 326 IAC 8-1-6 (BACT) and 326 IAC 2-8 (FESOP).

Recommendation

The staff recommends to the Commissioner that the 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 January 30, 2009. Additional information was received on February 26, April 16, April 20, and April 21, 2009.

Conclusion

The operation of this stationary heatset web offset printing press operation shall be subject to the conditions of the attached FESOP Renewal F011-27431-00026.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Meredith Jones at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5176 or toll free at 1-800-451-6027 extension 4-5176.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Company Name: JTS Direct, LLC dba doodad
Address: 720 Ransdell Road, Lebanon, IN 46052
Permit No.: F011-27431-00026
Reviewer: Meredith W. Jones
Date: 4/23/09

****Potential to Emit Summary****

Criteria Pollutants: Uncontrolled (tons/yr)

	<i>PM</i>	<i>PM₁₀</i>	<i>SO_x</i>	<i>NO_x</i>	<i>VOC</i>	<i>CO</i>
Printing Presses (Web 8, M-1000, & Miscellaneous Processes)	-	-	-	-	109.29	-
Catalytic Oxidizers (#1R & #2)	0.01	0.05	0.004	0.61	0.03	0.52
Boilers (2 units)	0.09	0.37	0.029	4.88	0.27	4.10
Total	0.10	0.42	0.03	5.49	109.60	4.62

Criteria Pollutants: Controlled (tons/yr)

	<i>PM</i>	<i>PM₁₀</i>	<i>SO_x</i>	<i>NO_x</i>	<i>VOC</i>	<i>CO</i>
Printing Presses (Web 8, M-1000, & Miscellaneous Processes)	-	-	-	-	6.59	-
Catalytic Oxidizers (#1R & #2)	0.01	0.05	0.004	0.61	0.03	0.52
Boilers (2 units)	0.09	0.37	0.029	4.88	0.003	4.10
Total	0.10	0.42	0.03	5.49	6.63	4.62

HAPs (tons/yr)

Xylene =	0.23	tons/yr
Cumene =	0.11	tons/yr
Hexane =	0.12	tons/yr
Ethylene Glycol =	0.74	tons/yr
Benzene =	0.0001	tons/yr
Dichlorobenzene =	0.00007	tons/yr
Formaldehyde =	0.004	tons/yr
Toluene =	0.0002	tons/yr
Lead =	0.00003	tons/yr
Cadmium =	0.00006	tons/yr
Chromium =	0.00008	tons/yr
Manganese =	0.00002	tons/yr
Nickel =	0.0001	tons/yr
Total =	1.20	tons/yr

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****VOC Emissions From Printing Presses (Web 8 and M-1000) & Miscellaneous Processes****

Web 8 and M-1000 are controlled by catalytic oxidizers #1R and #2, respectively. *Each has a VOC destruction efficiency of 99.0%

<u>Process Product</u>	<u>Density (lbs/gal)</u>	<u>Annual Usage (gal)</u>	<u>Weight % Volatiles</u>	<u>Flash Off (%)¹</u>	<u>Destruction Efficiency (%)</u>	<u>Uncontrolled VOC Emissions (tons/yr)</u>	<u>Controlled VOC Emissions (tons/yr)</u>
<u>Web 8 and M-1000</u>							
Heatset Inks ²	8.34	63,462.73	49.0%	80.0%	99.0%	103.74	1.04
Fuji Fountain Solution ^{2,3}	9.17	0.00	0.05%	30.0%	99.0%	0.00	0.00
FH Emer Prm Acid Fountain Solution ²	9.26	2890.80	0.04%	30.0%	99.0%	0.002	0.00002
Performa 7000 Wash ²	7.09	3241.20	94.0%	50.0%	0.0%	5.40	5.40
subtotal						109.14	6.44
<u>Miscellaneous Processes</u>							
3M Sup 77 Spr Ahd	5.85	14.06	75.00%	100.0%	0.0%	0.03	0.03
IM Chm Scratch remover	7.76	3.25	30.00%	100.0%	0.0%	0.00	0.00
Kodak Chm 850S	8.67	95.00	11.74%	100.0%	0.0%	0.05	0.05
Kodak Protherm Developer	9.42	1565.00	0.12%	100.0%	0.0%	0.01	0.01
Kodak Ultratherm	8.55	65.00	0.09%	100.0%	0.0%	0.00	0.00
RBP RE-NU plate cleaner	8.40	13.00	10.00%	100.0%	0.0%	0.01	0.01
HS Heatset Solvent	8.10	13.95	100.00%	100.0%	0.0%	0.06	0.06
subtotal						0.15	0.15

¹Heatset offset printing has an assumed flash off of 80%; other types of printers have a flash off of 100%.

²Annual usage (gal) was calculated based on 8760 hrs/yr of operation (to reflect the worst-case scenario) using the annual usage figures submitted by the Permittee, which assume that the presses operate for 6000 hrs/yr.

³VOC emissions are negligible because dilution ratio is approximately 3 ounces of solution to 1 gallon of water.

Total Potential VOC Emissions (tons/yr)
109.29 6.59

Methodology

*The destruction efficiency was obtained from the stack test conducted in September 2007 (DE of #1R was 99.1% and DE of #2 was 99.0%). The heatset ink with the largest potential to emit of all of those used at the source was used to calculate potential emissions.

Heatset Inks Annual Usage (gal) = 362,500 (lbs/yr) * (1 yr/6000 hrs) * (8760 hrs/yr) * Density (1 gal/8.34 lbs)

FH Emer Prm Acid Fountain Solution = 2000 (gal/yr) * (1 yr/6000 hrs) * (8760 hrs/yr)

Performa 7000 Wash Annual Usage (gal) = 40 (containers/yr) * (55 gal/container) * (1 yr/6000 hrs) * (8760 hrs/yr)

3M Sup 77 Spr Ahd Annual Usage (gal) = 75 containers * (24 oz/container) * (1 gal/128 oz)

IM Chm Scratch remover Annual Usage (gal) = 13 containers * (1 qt/container) * (1 gal/4 qts)

Kodak Chm 850S Annual Usage (gal) = 19 containers * (5 gal/container)

Kodak Protherm Developer Annual Usage (gal) = 313 containers * (5 gal/container)

Kodak Ultratherm Annual Usage (gal) = 13 containers * (5 gal/container)

HS Heatset Solvent Annual Usage (gal) = 113 lbs * Density (1 gal/8.10 lbs)

Weight % Volatiles = Weight % Volatiles (H₂O & Organics) - Weight % Water

Uncontrolled VOC Emissions (tons/yr) = Density (lbs/gal) * Annual Usage (gal) * Weight % Volatiles * Flash Off (%) * (1 ton/2000 lbs)

Controlled VOC Emissions (tons/yr) = Uncontrolled VOC Emissions (tons/yr) * (1 - Destruction Efficiency (%))

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****HAP Emissions From Printing Presses (Web 8 and M-1000) & Miscellaneous Processes****

<u>Process</u> <u>Product</u>	<u>Density</u> <u>(lbs/gal)</u>	<u>Annual Usage</u> <u>(gal)</u>	<u>Weight %</u> <u>Xylene</u>	<u>Weight %</u> <u>Cumene</u>	<u>Weight %</u> <u>Hexane</u>	<u>Weight %</u> <u>Ethylene Glycol</u>	<u>Xylene Emissions</u> <u>(tons/yr)</u>	<u>Cumene Emissions</u> <u>(tons/yr)</u>	<u>Hexane Emissions</u> <u>(tons/yr)</u>	<u>Ethylene Glycol</u> <u>Emissions (tons/yr)</u>
<u>Web 8 and M-1000</u>										
Heatset Inks	8.34	63,462.73	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00
Fuji Fountain Solution**	9.17	0.00	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00
FH Emer Prm Acid Fountain Solution	9.26	2890.80	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00
Performa 7000 Wash	7.09	3241.20	2.0%	1.0%	0.0%	0.0%	0.23	0.11	0.00	0.00
subtotal							0.23	0.11	0.00	0.00
<u>Miscellaneous Processes</u>										
3M Sup 77 Spr Ahd	5.85	14.06	0.0%	0.0%	40.0%	0.0%	0.00	0.00	0.02	0.00
IM Chm Scratch remover	7.76	3.25	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00
Kodak Chm 850S	8.67	95.00	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00
Kodak Protherm Developer	9.42	1565.00	0.0%	0.0%	0.0%	10.0%	0.00	0.00	0.00	0.74
Kodak Ultratherm	8.55	65.00	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00
RBP RE-NU plate cleaner	8.40	13.00	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00
HS Heatset Solvent	8.10	13.95	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00
subtotal							0.00	0.00	0.02	0.74
							0.23	0.11	0.02	0.74

Methodology

HAP emission rate (tons/yr) = Density (lbs/gal) * Annual Usage (gal) * Weight % HAP * (1 ton/2000 lbs)

Total Potential HAP Emissions (tons/yr) = 1.10

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****Natural Gas Combustion: Catalytic Oxidizers (#1R & #2)****
MMBtu/Hr <100

Catalytic Oxidizer #1R = 0.54 MMBtu/hr
 Catalytic Oxidizer #2 = 0.864 MMBtu/hr

Total Heat Input Capacity (MMBtu/hr) = Potential Throughput (MMCF/yr) =

	Pollutant					
	PM*	PM ₁₀ *	SO ₂	NO _x **	VOC	CO
<i>Emission Factor (lbs/10⁶ scf)</i>	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emissions (tons/yr)	0.01	0.05	0.004	0.61	0.03	0.52

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

**Emission Factors for NO_x: Uncontrolled = 100; Low NO_x Burner = 50; Low NO_x Burners/Flue gas recirculation = 32

HAPs

	Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
<i>Emission Factor (lbs/10⁶ scf)</i>	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emissions (tons/yr)	0.00001	0.00001	0.0005	0.011	0.00002

	Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
<i>Emission Factor (lbs/10⁶ scf)</i>	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emissions (tons/yr)	0.000003	0.00001	0.00001	0.000002	0.00001

Total HAPs = 0.012 tons/yr

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

10⁶ scf = MMCF

Heating Value = 1000 MMBtu/10⁶ scf

Potential Throughput (MMCF/yr) = Total Heat Input Capacity (MMBtu/hr) * (8760 hrs/yr) * (1 MMCF/1000 MMBtu)

Potential Emissions (tons/yr) = Potential Throughput (MMCF/yr) * Emission Factor (lbs/10⁶ scf) * (1 ton/2000 lbs)

Emission Factors are from US EPA's AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2.

The five highest of both organic and metal HAPs emission factors (from US EPA's AP 42, Chapter 1.4, Tables 1.4-2, 1.4-3, and 1.4-4) are provided; additional HAPs emission factors are available in AP 42, Chapter 1.4.

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****Natural Gas Combustion: Boilers****
Unrestricted Potential Emissions (tons/yr)

Web 8 boiler = 2.5 MMBtu/hr
M-1000 boiler = 8.64 MMBtu/hr

The Web 8 and M-1000 boilers are controlled by catalytic oxidizers #1R and #2, respectively. ¹Each has a VOC destruction efficiency of 99.0%

Total Heat Input Capacity (MMBtu/hr) = 11.14 Potential Throughput (MMCF/yr) = 97.59

	Pollutant					
	PM*	PM ₁₀ *	SO ₂	NO _x **	VOC	CO
<i>Emission Factor (lbs/10⁶ scf)</i>	1.9	7.6	0.6	100.0	5.5	84.0
Unrestricted Potential Emissions (tons/yr)	0.09	0.37	0.029	4.88	0.27	4.10
Controlled Potential Emissions (tons/yr)	0.09	0.37	0.029	4.88	0.003	4.10

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

**Emission Factors for NO_x: Uncontrolled = 100; Low NO_x Burner = 50; Low NO_x Burners/Flue gas recirculation = 32

HAPs

	Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
<i>Emission Factor (lbs/10⁶ scf)</i>	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Unrestricted Potential Emissions (tons/yr)	0.00010	0.00006	0.004	0.088	0.0002

	Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
<i>Emission Factor (lbs/10⁶ scf)</i>	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Unrestricted Potential Emissions (tons/yr)	0.00002	0.00005	0.00007	0.00002	0.0001

Total HAPs = 0.092 tons/yr

Methodology

¹The destruction efficiency was obtained from the stack test conducted in September 2007 (DE of #1R was 99.1% and DE of #2 was 99.0%).

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

10⁶ scf = MMCF

Heating Value = 1000 MMBtu/10⁶ scf

Potential Throughput (MMCF/yr) = Total Heat Input Capacity (MMBtu/hr) * (8760 hrs/yr) * (1 MMCF/1000 MMBtu)

Unrestricted Potential Emissions (tons/yr) = Potential Throughput (MMCF/yr) * Emission Factor (lbs/10⁶ scf) * (1 ton/2000 lbs)

Controlled Potential VOC Emissions (tons/yr) = Potential Throughput (MMCF/yr) * Emission Factor (lbs/10⁶ scf) * (1 ton/2000 lbs) * (1 - Destruction Efficiency (%))

Emission Factors are from US EPA's AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2.

The five highest of both organic and metal HAPs emission factors (from US EPA's AP 42, Chapter 1.4, Tables 1.4-2, 1.4-3, and 1.4-4) are provided; additional HAPs emission factors are available in AP 42, Chapter 1.4.



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Craig Harmon
JTS Direct, LLC dba doodad
720 Randsdell Rd
Lebanon, IN 46052

DATE: July 15, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
FESOP Renewal
011-27431-00026

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Bruno Ferraro - Grove Scientific & Engineering, Co.
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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July 15, 2009

TO: Lebanon Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: JTS Direct, LLC dba doodad
Permit Number: 011-27431-00026

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 7/15/2009 JTS Direct, LLC dba doodad 011-27431-00026 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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2		Commissioners Boone County Commissioners Courthouse Square Lebanon IN 46052 (Local Official)										
3		Boone County Health Department 116 W Washington St. #B202 Lebanon IN 46052-2174 (Health Department)										
4		Daryl & Lois Hoffman 7750 N. CR 75 E Lizton IN 46149 (Affected Party)										
5		Lebanon Public Library 104 E Washington St Lebanon IN 46052-2298 (Library)										
6		Lebanon City Council and Mayors Office 201 E. Main St. Lebanon IN 46052 (Local Official)										
7		Mr. Bruno Ferraro Grove Scientific & Engineering, Co. 6140 Edgewater Drive Suite F Orland FL 32810 (Consultant)										
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