



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: March 19, 2010

RE: R.R. Donnelley & Sons Company / 085-28593-00009

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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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Debora Woodward
R.R. Donnelley & Sons Company
2801 West Old Road 30
P.O. Box 837
Warsaw, Indiana 46581-0837

March 19, 2010

Re: 085-28593-00009
Significant Permit Modification to
Part 70 Renewal No.: T085-23864-00009

Ms. Woodward:

R.R. Donnelley & Sons Company was issued Part 70 Operating Permit Renewal No. 085-23864-00009 on December 18, 2008, for a stationary publication rotogravure printing operation. A letter requesting changes to this permit was received on October 13, 2009. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of two (2) heatset web offset lithographic printing presses and all conditions that apply to those units, including the requirements of 326 IAC 8-1-6 (Best Available Control Technology (BACT)).

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire Part 70 Operating Permit Renewal as modified.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Stephanie Wilkerson, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Stephanie Wilkerson or extension 4-5329, or dial (317) 234-5329.

Sincerely,

Chrystal Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments

sjw

cc: File - Kosciusko County
U.S. EPA, Region V
Kosciusko County Health Department
IDEM Northern Regional Office
Compliance and Enforcement Branch



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

R.R. Donnelley & Sons Company
2801 West Old Road 30
Warsaw, Indiana 46581

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T085-23864-00009	
Issued by: Original Signed by:	Issuance Date: December 18, 2008
Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date: December 18, 2013

Significant Permit Modification No.: 085-28593-00009		Pages Affected: All
Issued by:	Issuance Date: March 19, 2010	
 Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date: December 18, 2013	

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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 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary publication rotogravure printing operation.

Source Address:	2801 West Old Road 30, Warsaw, Indiana 46581
Mailing Address:	2801 West Old Road 30, P.O. Box 837, Warsaw, IN 46581
General Source Phone Number:	574-267-9067
SIC Code:	2754
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major 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 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) Four (4) natural gas or No. 2 fuel oil fired boilers described as follows:
 - (1) B1 and B2 installed in October of 1979, each with a maximum rated capacity of 85 MMBtu/hr,
 - (2) B3, installed in July of 1971 with a maximum rated capacity of 78 MMBtu/hr,
 - (3) B4, installed in June of 1994, with a maximum rated capacity of 98.4 MMBtu/hr. Under 40 CFR 60.40c, Subpart Dc, this is considered an existing small industrial-commercial-institutional steam generating unit.
- (b) Twelve (12) publication rotogravure printing presses, each using a carbon adsorption solvent recovery system with seventeen (17) adsorbers as control, Under 40 CFR 63.820, Subpart KK, these are considered an existing printing and publishing industry operation, described as follows:
 - (1) WR-429, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute, and enclosed by permanent total enclosure (PTE). Under 40 CFR 60.430, Subpart QQ, this is considered an existing graphic arts industry: publication rotogravure printing operation.
 - (2) WRO-487, with a maximum printing width of 69 inches and a maximum line speed of 2000 feet per minute,

- (3) WRO-488 and WRO-489, installed in February 1978, with each press having a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute,
 - (4) WRO-490, installed in August 1989, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2756 feet per minute. Under 40 CFR 60.430, Subpart QQ, this is considered an existing graphic arts industry: publication rotogravure printing operation.
 - (5) WRO-491, WRO-492, and WRO-493, installed in August 1994, February 1995 and October 2002, respectively, with each press having a maximum printing width of 125 inches and a maximum line speed of 3000 feet per minute, and enclosed by permanent total enclosure (PTE). Under 40 CFR 60.430, Subpart QQ, these are considered an existing graphic arts industry: publication rotogravure printing operation.
 - (6) WR-444, installed in December of 1996, with a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and, although not required by rule, enclosed by permanent total enclosure (PTE). Under 40 CFR 60.430, Subpart QQ, this is considered an existing graphic arts industry: publication rotogravure printing operation.
 - (7) WR-441, WR-442, WR-443, installed in December of 1996, with each press having a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and enclosed by permanent total enclosure (PTE). Under 40 CFR 60.430, Subpart QQ, these are considered an existing graphic arts industry: publication rotogravure printing operation.
- (c) One (1) gravure cylinder wash machine, identified as GCW, installed in April of 1995, located in the east plant. Under 40 CFR 63.820, Subpart KK, this is considered an existing printing and publishing industry operation.
 - (d) One (1) gravure parts press parts washer, identified as GPW, installed in 1991, located in the east plant. Under 40 CFR 63.820, Subpart KK, this is considered an existing printing and publishing industry operation.
 - (e) One (1) gravure cylinder wash machine, identified as WCWM, installed in May of 2000, located in the west plant, using the carbon adsorption solvent recovery system and enclosed by permanent total enclosure (PTE). Under 40 CFR 63.820, Subpart KK, this is considered an existing printing and publishing industry operation.
 - (f) One (1) gravure press parts washer, identified as WGPW, installed in May of 2000, located in the west plant, enclosed by permanent total enclosure (PTE). Under 40 CFR 63.820, Subpart KK, this is considered an existing printing and publishing industry operation.
 - (g) Two (2) chromium plating lines, CR1 and CR2, installed in February and March of 2007, using a composite mesh pad system with a hepafilter as control, each having two (2) rectifiers with a maximum combined capacity of 18,000 amps for each tank. Under 40 CFR 63.340, Subpart N, this is considered existing chromium emissions from hard and decorative chromium electroplating and chromium anodizing tanks.
 - (h) One (1) pneumatic dust and paper trim collection system located in the east plant and consisting of the following:

- (1) One (1) cyclone, identified as EPC-3, installed in May of 1994, exhausting to one (1) baghouse, identified as EPBH-C, installed in June of 1994,
 - (2) One (1) cyclone, identified as EPC-1, installed in October of 2003.
 - (3) One (1) cyclone, identified as EPC-2, installed in 1978,
 - (4) One (1) cyclone concentrator, identified as EPCON-5, installed in June of 1995, exhausting to one (1) baghouse, EPBH-G, installed in September of 2003, EPCON-5 concentrated paper sent to EPC-3,
 - (5) Three (3) baghouses, identified as EPBH-C, EPBH-D, installed in June of 1994, and EPBH-E, with collected dust sent to one (1) dust auger, silo, and baghouse (EPBH-F) system,
 - (6) One (1) Baghouse EPBH-G, installed in September of 2003.
 - (7) One (1) cyclone, identified as EPC-4, with air exhausting to one (1) baghouse, EPBH-D with concentrated dust sent to one (1) dust auger, silo, and baghouse (EPBH-F) system.
- (i) One (1) pneumatic paper trim collection system located in the west plant and consisting of the following:
- (1) One (1) cyclone, identified as WPC-1, installed in June of 1969,
 - (2) One (1) cyclone, identified as WPC-2, installed in June of 1969,
 - (3) One (1) cyclone concentrator, identified as WPCON-3, installed in August of 1993, modified in June 2002, with concentrated paper sent primarily to a cyclone, WPC-1 or secondarily to WPC-2, exhausting to the atmosphere.
 - (4) One (1) cyclone concentrator, identified as WPCON-4, installed in August of 1993, modified June 2002, which has a maximum capacity of 10,500 pounds per hour, with concentrated paper sent primarily to cyclone WPC-1, or secondarily to WPC-2,
 - (5) One (1) cyclone concentrator, identified as WPCON-5, installed in June 2002, which has a maximum capacity of 10,500 pounds per hour, with concentrated paper sent primarily to cyclone WPC-1, or secondarily to WPC-2.
- (j) Five (5) cylinder making finishing sinks located in the east plant, identified as EPFS-1 through EPFS-5, installed in September of 1994,
- (k) One (1) wastewater treatment system located in the east plant and consisting of:
- (1) One (1) 800-gallon solvent/water separator, identified as WWT-4, installed in 2003,
 - (2) One (1) 1000-gallon solvent/water separator, identified as WWT-2, installed in 1985,
 - (3) One (1) 17,800-gallon air sparging tank, identified as WWT-3, installed in 1985.

- (l) Two (2) cylinder making finishing sink stations located in the west plant, identified as WPFS-1, installed in April of 1990, and WPFS-2, originally installed in the east plant in September 1994 and relocated to the west plant in March 2007.
- (m) Thirty-seven (37) storage tanks, installed in dates ranging from 1960 through 1989.
- (n) Eight (8) portable ink jet printers located in the east and west plants, identified as Ink Jet #1 through Ink Jet #8, each with a nominal throughput of 0.93 pounds of black ink and replenisher per hour, and one of which is an alternate ink jet printer with a maximum throughput of 0.064 pounds of ink, makeup and cleaner solvent per hour, with multiple exhaust stacks and associated ventilation ductwork, identified as IJP.
- (o) One (1) Heidelberg-Harris heatset web offset lithographic printing press with eight (8) units and two (2) webs identified as Press WM-401 with a maximum line speed of 1800 feet per minute and a maximum printing width of 38 inches, with associated in-line equipment and VOC emissions controlled by a regenerative thermal oxidizer, identified as RTO-1; and
- (p) One (1) Heidelberg-Harris heatset web offset lithographic printing press, identified as WM-402, with eight (8) units and two (2) webs, with a maximum speed of 3,000 feet per minute and a maximum printing width of 57 inches, with associated in-line equipment and VOC emissions controlled by recuperative thermal oxidizers, identified as IDO-1, integrated into the press dryers; and
- (q) One (1) Goss heatset web offset lithographic printing press, identified as WM-403, with eight (8) units and two (2) webs, with a maximum speed of 3,000 feet per minute and a maximum printing width of 57 inches, with associated in-line equipment and VOC emissions controlled by one (1) regenerative thermal oxidizer, identified as RTO-1.

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

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T085-23864-00009, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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

and

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

Indiana Department of Environmental Management
Compliance 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 2-7-5(3)(C)(ii) and must contain the following:

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

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

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

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T085-23864-00009 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

Indiana Department of Environmental Management
Compliance 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

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

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
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 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

Indiana Department of Environmental Management
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 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

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

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

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

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2.

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

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

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

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

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

Indiana Department of Environmental Management
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), 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 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.6 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the 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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

Indiana Department of Environmental Management
Compliance 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on November 1, 1992.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; 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 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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

The statement must be submitted to:

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
[326 IAC 2-2][326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;

- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

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

Indiana Department of Environmental Management
Compliance 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.

- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.
- Reports required in this part shall be submitted to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS: Boilers

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

- (a) Four (4) natural gas or No. 2 fuel oil fired boilers described as follows:
- (1) B1 and B2, installed in October of 1979, each with a maximum rated capacity of 85 MMBtu/hr,
 - (2) B3, installed in July of 1971 with a maximum rated capacity of 78 MMBtu/hr,
 - (3) B4, installed in June of 1994, with a maximum rated capacity of 98.4 MMBtu/hr. Under 40 CFR 60.40c, Subpart Dc, this is considered an existing small industrial-commercial-institutional steam generating unit.

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

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

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

- (a) Pursuant to 326 IAC 6-2-3 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (c)), particulate emissions from boilers B1, B2, and B3 shall be limited to 0.34, 0.34, and 0.8 pounds of particulate matter per MM Btu of heat input, respectively, by the following equation:

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

- where Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input;
- C = maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter (µg/m³) for a period not to exceed a sixty (60) minute time period;
- Q = total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input;
- N = number of stacks in fuel burning operation;
- a = plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input; and
- h = stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times pa_i \times Q}{\sum_{i=1}^N pa_i \times Q}$$

where:

pa = the actual controlled emission rate in lb/MMBtu using the emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

- (b) Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from boiler B4 shall be limited to 0.24 pounds of PM per MMBtu by the following equation:

$$P_t = \frac{1.09}{Q_{0.26}} \quad \text{Where } Q = \text{total source capacity (MMBtu/hr)}$$

where P_t = 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.

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

- (a) Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from the ninety-eight and four-tenths (98.4) MMBtu per hour boiler B4 shall not exceed five tenths (0.5) pounds per million Btu heat input when burning distillate fuel oil.
- (b) Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the seventy-eight (78) MMBtu per hour and the two (2) eighty-five (85) MMBtu per hour fuel oil-fired boilers, identified as B3, B2, and B1, respectively, shall not exceed five-tenths (0.5) pounds per MMBtu heat input when burning distillate oil.

D.1.3 Sulfur Dioxide (SO₂) & Oxides of Nitrogen (NO_x) PSD Synthetic Minor Limitations [326 IAC 2-2]

Pursuant to T085-6040-00009 issued on August 5, 2002, boilers B1, B2, and B4 shall have the following SO₂ limits:

- (a) for boilers B1 and B2;
- (1) 0.5 lb of SO₂ per MMBtu for distillate oil combustion.
- (2) combined SO₂ emissions from B1 and B2 shall not exceed 245 tons per twelve (12) consecutive month period.
- ((B1 No. 2 fuel oil usage per month + B2 No. 2 fuel oil usage per month)*(SO₂ EF for No. 2 fuel)) ≤ an average of 245 tons per 12 consecutive month period.
- Where the EF for No.2 fuel shall be based on the sulfur content of the fuel burned and the AP-42 emission factors for boilers of less than 100 MMBtu/hr from Table 1.3-1 of AP-42 updated September 1998.
- (b) for boiler B4;
- (1) No. 2 fuel oil consumption not to exceed 3950 kgal per twelve (12) consecutive month period with a sulfur content not to exceed 0.05%.
- (2) For every 1 MMCF of Natural Gas used the No. 2 fuel oil consumption shall be reduced by 5 kgal. Compliance with these limits shall keep the Sulfur Dioxide

(SO₂) & Oxides of Nitrogen (NO_x) emissions to <40 tpy for boiler B4. Therefore, 326 IAC 2-2 does not apply.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.1.5 Visible Emissions Notations

- (a) The Permittee will conduct one visible emission notation during normal operations at least once per week for each week during which the respective boiler is operated. A trained employee or other trained observer shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee or observer is someone who has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc and 326 IAC 7-1.1-1, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of the visible emission notations of the boilers stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 and the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

New Source Performance Standards (NSPS) Requirements

D.1.8 General Provisions Relating to NSPS Subpart Dc [40 CFR Part 60, Subpart A]

Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12, except as otherwise specified in 40 CFR Part 60, Subpart Dc, for boiler B4.

D.1.9 Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units NSPS [40 CFR Part 60, Subpart Dc] [326 IAC 12]

The Permittee which engages in publication rotogravure printing operation shall comply with the following provisions of 40 CFR Part 60, Subpart Dc, (included as Attachment A of this permit).

- (1) 40 CFR 60.40c
- (2) 40 CFR 60.41c
- (3) 40 CFR 60.42c(d)(g)(h)(i)
- (4) 40 CFR 60.43c(c)(d)
- (5) 40 CFR 60.44c
- (6) 40 CFR 60.45c
- (7) 40 CFR 60.46c
- (8) 40 CFR 60.47c
- (9) 40 CFR 60.48c

SECTION D.2

FACILITY OPERATION CONDITIONS: Rotogravure Presses

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

- (b) Twelve (12) publication rotogravure printing presses, each using a carbon adsorption solvent recovery system with seventeen (17) adsorbers as control, Under 40 CFR 63.820, Subpart KK, these are considered an existing printing and publishing industry operation, described as follows:
 - (1) WR-429, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute, and enclosed by permanent total enclosure (PTE). Under 40 CFR 60.430, Subpart QQ, this is considered an existing graphic arts industry: publication rotogravure printing operation.
 - (2) WRO-487, with a maximum printing width of 69 inches and a maximum line speed of 2000 feet per minute,
 - (3) WRO-488 and WRO-489, installed in February 1978, with each press having a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute,
 - (4) WRO-490, installed in August 1989, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2756 feet per minute. Under 40 CFR 60.430, Subpart QQ, this is considered an existing graphic arts industry: publication rotogravure printing operation.
 - (5) WRO-491, WRO-492, and WRO-493, installed in August 1994, February 1995 and October 2002, respectively, with each press having a maximum printing width of 125 inches and a maximum line speed of 3000 feet per minute, and enclosed by permanent total enclosure (PTE). Under 40 CFR 60.430, Subpart QQ, these are considered an existing graphic arts industry: publication rotogravure printing operation.
 - (6) WR-444, installed in December of 1996, with a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and, although not required by rule, enclosed by permanent total enclosure (PTE). Under 40 CFR 60.430, Subpart QQ, this is considered an existing graphic arts industry: publication rotogravure printing operation.
 - (7) WR-441, WR-442, WR-443, installed in December of 1996, with each press having a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and enclosed by permanent total enclosure (PTE). Under 40 CFR 60.430, Subpart QQ, these are considered an existing graphic arts industry: publication rotogravure printing operation.
- (c) One (1) gravure cylinder wash machine, identified as GCW, installed in April of 1995, located in the east plant. Under 40 CFR 63.820, Subpart KK, this is considered an existing printing and publishing industry operation.
- (d) One (1) gravure parts press parts washer, identified as GPW, installed in 1991, located in the east plant. Under 40 CFR 63.820, Subpart KK, this is considered an existing printing and publishing industry operation.
- (e) One (1) gravure cylinder wash machine, identified as WCWM, installed in May of 2000, located in the west plant, using the carbon adsorption solvent recovery system and enclosed by permanent total enclosure (PTE). Under 40 CFR 63.820, Subpart KK, this is considered an existing printing and publishing industry operation.
- (f) One (1) gravure press parts washer, identified as WGPW, installed in May of 2000, located in the

west plant, enclosed by permanent total enclosure (PTE). Under 40 CFR 63.820, Subpart KK, this is considered an existing printing and publishing industry operation.

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

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

D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), no owner or operator of a facility subject to this section and employing solvent-containing ink may cause, allow, or permit the operation of the facility unless:
- (1) the volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water;
 - (2) the ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material;
 - (3) the owner or operator installs and operates a carbon adsorption system that reduces the volatile organic emissions from the capture system by at least ninety percent (90%) by weight;
- (b) A capture system must be used in conjunction with the emission control systems and shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system of seventy-five percent (75%) for publication rotogravure processes.

D.2.2 VOC Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

- (a) for rotogravure press WR-429;
- (1) The VOC input shall be less than 34,550 tons, per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) for rotogravure press WRO-490;
- (1) The VOC input shall be less than 4,910 tons, per twelve (12) consecutive month period, with compliance determined at the end of each month, and
 - (2) Solvent recovery overall efficiency of no less than 87%.
- (c) for rotogravure presses WR-441, WR-442, and WR-443;
- (1) The VOC input shall be less than 9,468 tons, per twelve (12) consecutive month period, with compliance determined at the end of each month, and
 - (2) No less than 98% adsorber efficiency, and
 - (3) Permanent total enclosure (PTE) (100% capture).
- (d) for rotogravure press WR-444;

- (1) The VOC input shall be less than 3,120 tons, per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (e) for the parts and cylinder washers, WGPW and WCWM:
- (1) The VOC input shall be less than 500 tons, per twelve (12) consecutive month period, with compliance determined at the end of each month. When operating the carbon adsorption system to achieve this limit, the carbon adsorption system shall maintain an overall control efficiency of 98% per twelve (12) consecutive month period, and
 - (2) In the event that the carbon adsorption system is not operating, the amount of VOC input to the parts and cylinder washers shall be limited such that the VOC input with the carbon adsorption system operating times 0.02 added to the VOC input with the carbon adsorption system not operating shall not exceed VOC emissions of ten (10) tons per twelve (12) consecutive month period.

D.2.3 PSD BACT Limitations [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (PSD BACT Limitations), the specific facilities have the following limitations:

Pursuant to CP 085-3117-00009, issued December 10, 1993 and CP 085-4396-00009, issued on November 27, 1995, BACT is as follows for presses WRO-491, WRO-492 and WRO-493:

- (1) Daily adsorber efficiency of no less than 95%;
- (2) Rolling 12 month average of no less than 98% adsorber efficiency; and
- (3) Permanent total enclosure (PTE) which is equivalent to 100% capture efficiency.

D.2.4 VOC Control Requirement [326 IAC 2-2]

Pursuant to T085-6040-00009 issued on August 5, 2002 rotogravure press WRO-487 shall have a ducted capture system to the solvent recovery system with total control efficiency of no less than 75% on a monthly basis.

D.2.5 Cold Cleaner Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, the owner or the operator of the gravure cylinder wash machines, GCW, and WCWM, and the gravure press parts washers, GPW and WGPW, shall:

- (a) equip each cleaner with a cover,
- (b) equip each cleaner with a facility for draining cleaned parts,
- (c) close the degreaser cover whenever parts are not being handled in the cleaner,
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases,
- (e) provide a permanent, conspicuous label summarizing the operating requirements, and
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can not evaporate into the atmosphere.

D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.2.7 Carbon Adsorption Unit Monitoring, CAM [40 CFR 64]

- (a) The solvent recovery system shall be in operation at all times that any of the rotogravure printing presses are in operation or are being cleaned using organic solvents.
- (b) At all time that the carbon adsorption control system for the parts and cylinder washers is in operation and being utilized to demonstrate compliance with the VOC emission limitations, the control system shall be monitored using the inlet and outlet analyzers on the solvent recovery system and monitoring the pressure differential in the enclosure to meet permanent total enclosure requirements.
- (c) The systems conveying the exhaust gases from the publication rotogravure production printing presses WR-429, WR-441, WR-442, WR-443, WR -444 WRO-491, WRO-492 and WRO-493, enclosures to the solvent recovery system shall operate at all times any of the presses in the respective enclosures are in operation, or are being cleaned using organic solvents. These enclosures shall have natural draft opening areas totaling not in excess of 5% of the total area of the walls, floor, and the ceiling of the enclosure. The enclosures shall be equipped with adequate negative pressure ventilation to provide a minimum face air velocity of 200 feet per minute, when all natural draft openings are simultaneously open. A pressure drop of greater than or equal to 0.013 mmHg (0.007 in H₂O) will demonstrate the 200 feet per minute face air velocity. All cylinder access doors (on the gear side) shall remain closed during the press operations except for the emergency escape. All personnel access doors (on the button side) shall remain closed, except for the momentary opening to allow access of personnel and materials. If these criteria are met, the VOC capture of the enclosure shall be considered to be 100%.
- (d) An inspection shall be performed each calendar quarter of the carbon adsorption unit controlling the parts and cylinder washers. All defective beds shall be repaired or replaced. The Permittee is not required to shut down the system in order to conduct the quarterly inspection. The Permittee shall monitor and inspect the carbon adsorption solvent recovery system and the ducted solvent capture system to ensure proper operation and maintenance.
- (e) In the event that a failure of the carbon adsorber has been observed, the affected compartments will be shut down immediately until the failed units have been repaired or replaced.

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, D.2.2, D.2.3, and D.2.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1, D.2.2, D.2.3, and D.2.4.

- (1) The VOC content of the inks and cleaning solvents used for each month;
- (2) The cleanup solvent usage for each month;

- (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
 - (5) The monthly average recovery efficiency for the carbon adsorption system.
 - (6) The malfunction reports of the systems.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under D.2.7(d) and (e).
 - (c) To document compliance with Condition D.2.7(a) the source shall keep records of the malfunction reports of the solvent recovery system; and other malfunction reports of the presses, when the solvent recovery system is operating but the presses are not venting to the solvent recovery system.
 - (d) To document compliance with Condition D.2.7(c) the source shall keep records of the malfunction reports of the systems conveying the exhaust gases from the enclosure; and other malfunction reports of the presses, when the systems conveying the exhaust gases from the enclosure to the adsorber, are not operating but the presses in the respective enclosures are in operation.
 - (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2, D.2.3, and D.2.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

New Source Performance Standards (NSPS) Requirements

D.2.10 General Provisions Relating to NSPS Subpart QQ [40 CFR Part 60, Subpart A]

Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12, except as otherwise specified in 40 CFR Part 60, Subpart QQ.

D.2.11 Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing NSPS [40 CFR Part 60, Subpart QQ] [326 IAC 12]

The Permittee which engages in publication rotogravure printing operation shall comply with the following provisions of 40 CFR Part 60, Subpart QQ, (included as Attachment B of this permit).

- (1) 40 CFR 60.430
- (2) 40 CFR 60.431
- (3) 40 CFR 60.432
- (4) 40 CFR 60.433
- (5) 40 CFR 60.434
- (6) 40 CFR 60.435

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

D.2.12 General Provisions Relating to NESHAP KK [326 IAC 20-18][40 CFR 63, Subpart A]

Pursuant to 40 CFR 63.820, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1.

D.2.13 Printing and Publishing Industry NESHAP [40 CFR 63, Subpart KK]

The Permittee which engages in publication rotogravure printing operation shall comply with the following provisions of 40 CFR 63, Subpart KK (included as Attachment C of this permit):

- (1) 40 CFR 63.820
- (2) 40 CFR 63.821
- (3) 40 CFR 63.822
- (4) 40 CFR 63.823
- (5) 40 CFR 63.824
- (6) 40 CFR 63.825
- (7) 40 CFR 63.826
- (8) 40 CFR 63.827
- (9) 40 CFR 63.828
- (10) 40 CFR 63.829
- (11) 40 CFR 63.830
- (12) 40 CFR 63.831

SECTION D.3

FACILITY OPERATION CONDITIONS: Chromium Plating Lines

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

- (g) Two (2) chromium plating lines, CR1 and CR2, installed in February and March of 2007, using a composite mesh pad system with a hepafilter as control, each having two (2) rectifiers with a maximum combined capacity of 18,000 amps for each tank. Under 40 CFR 63.340, Subpart N, this is considered existing chromium emissions from hard and decorative chromium electroplating and chromium anodizing tanks.

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

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

D.3.1 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the chromium plating lines.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

D.3.2 General Provisions Relating to NESHAP N [326 IAC 20-8][40 CFR 63, Subpart A]

Pursuant to 40 CFR 63.340, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1.

D.3.3 Printing and Publishing Industry NESHAP [40 CFR 63, Subpart N]

The Permittee which engages in publication rotogravure printing operation shall comply with the following provisions of 40 CFR 63, Subpart N (included as Attachment D of this permit):

- (1) 40 CFR 63.340
- (2) 40 CFR 63.341
- (3) 40 CFR 63.342
- (4) 40 CFR 63.343
- (5) 40 CFR 63.344
- (6) 40 CFR 63.346
- (7) 40 CFR 63.347
- (8) 40 CFR 63.348

SECTION D.4

FACILITY OPERATION CONDITIONS: Collection System

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

- (h) One (1) pneumatic dust and paper trim collection system located in the east plant and consisting of the following:
- (1) One (1) cyclone, identified as EPC-3, installed in May of 1994, exhausting to one (1) baghouse, identified as EPBH-C, installed in June of 1994,
 - (2) One (1) cyclone, identified as EPC-1, installed in October of 2003.
 - (3) One (1) cyclone, identified as EPC-2, installed in 1978,
 - (4) One (1) cyclone concentrator, identified as EPCON-5, installed in June of 1995, exhausting to one (1) baghouse, EPBH-G, installed in September of 2003, EPCON-5 concentrated paper sent to EPC-3,
 - (5) Three (3) baghouses, identified as EPBH-C, EPBH-D, installed in June of 1994, and EPBH-E, with collected dust sent to one (1) dust auger, silo, and baghouse (EPBH-F) system,
 - (6) One (1) Baghouse EPBH-G, installed in September of 2003.
 - (7) One (1) cyclone, identified as EPC-4, with air exhausting to one (1) baghouse, EPBH-D with concentrated dust sent to one (1) dust auger, silo, and baghouse (EPBH-F) system.
- (i) One (1) pneumatic paper trim collection system located in the west plant and consisting of the following:
- (1) One (1) cyclone, identified as WPC-1, installed in June of 1969,
 - (2) One (1) cyclone, identified as WPC-2, installed in June of 1969,
 - (3) One (1) cyclone concentrator, identified as WPCON-3, installed in August of 1993, modified in June 2002, with concentrated paper sent primarily to a cyclone, WPC-1 or secondarily to WPC-2, exhausting to the atmosphere.
 - (4) One (1) cyclone concentrator, identified as WPCON-4, installed in August of 1993, modified June 2002, which has a maximum capacity of 10,500 pounds per hour, with concentrated paper sent primarily to cyclone WPC-1, or secondarily to WPC-2,
 - (5) One (1) cyclone concentrator, identified as WPCON-5, installed in June 2002, which has a maximum capacity of 10,500 pounds per hour, with concentrated paper sent primarily to cyclone WPC-1, or secondarily to WPC-2.

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

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

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the pneumatic paper dust and trim collection in the east plant system shall not exceed allowable PM emission rate of 20.3

pounds per hour based on a process weight rate of 10.19 tons of paper per hour using the following equation:

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

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the three (3) waste paper concentrators in the west plant system, WPCON- 3, WPCON-4, and WPCON-5, and the two (2) cyclones, WPC-1 and WPC-2, shall not exceed allowable PM emission rate of 26.00 pounds per hour based on a process weight rate of 31,500 pounds of paper per hour using the following equation:

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

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

- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the Cyclone EPC-1 and Dust Auger and Silo shall be limited as follows:

Facility	Process Weight Rate	Particulate Emissions Limit (lb/hr)
Cyclone EPC-1	4.0	10.4
Dust Auger and Silo	2.25	7.1

These limits shall be determined using the following equation:

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

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

D.4.2 PSD Limit [326 IAC 2-2]

- (a) PM and PM-10 emissions from the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, shall be limited to 1.0 lb/ton and 0.6 lb/ton, respectively. Compliance with these limits shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable and also satisfy the requirement of Condition D.4.1.
- (b) The input of paper to the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, shall be limited to less than 25,000 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month. This usage limit is required to limit the potential to emit of PM to less than 25 tons per twelve (12) consecutive month period and PM10 to less than 15 tons per twelve (12) consecutive month period. Compliance with this limit

shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (c) Pursuant to Significant Permit Modification No. 085-18151-00009, issued on December 5, 2003, the input of waste paper to the Cyclone EPC-1 shall be limited to 35,040 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Baghouse EPBH-F shall be in operation at all times the Dust Auger and Silo are in operation.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.4.4 Visible Emissions Notations

- (a) Visible emission notations of the Cyclone EPC-1 (when venting to a baghouse) and EPBH-F, pneumatic paper dust and trim collection systems, WPC-1, WPC-2, WPCON-4, EPC-3 & EPBH-C stack exhausts, shall be performed once per week during normal daylight operations when exhausting to the atmosphere. A trained employee or other trained observer shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.4.5 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B- Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature,

flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.4.6 Record Keeping Requirements

- (a) To document compliance with D.4.2(b), the Permittee shall maintain monthly records of paper throughput to the three (3) waste paper concentrators (WPCON-3, WPCON-4, and WPCON-5), and the two (2) cyclones (WPC-1 and WPC-2).
- (b) To document compliance with D.4.2 (c), the Permittee shall maintain monthly records of waste paper throughput to the Cyclone EPC-1.
- (c) To document compliance with Condition D.4.4, the Permittee shall maintain records of weekly visible emission notations of Cyclone EPC-1 and EPBH-F stack exhausts.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.2(b) and Condition D.4.2(c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the report forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.5

FACILITY CONDITIONS: Ink Jet Printers

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

- (n) Eight (8) portable ink jet printers located in the east and west plants, identified as Ink Jet #1 through Ink Jet #8, each with a nominal throughput of 0.93 pounds of black ink and replenisher per hour, and one of which is an alternate ink jet printer with a maximum throughput of 0.064 pounds of ink, makeup and cleaner solvent per hour, with multiple exhaust stacks and associated ventilation ductwork, identified as IJP.

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

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

D.5.1 Volatile Organic Compounds (VOCs) Limits [326 IAC 2-2] [326 IAC 8-1-6][326 IAC 2-4.1-1]

The following equipment has VOC and hazardous air pollutants (HAPs) usage limits such that 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) and 326 IAC 2-4.1-1 (New Source Toxics Control), shall not apply:

Eight (8) portable ink jet printers (Ink Jet #1 through Ink Jet #8)

- (a) Volatile Organic Compounds (VOCs) usage shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month; and
- (b) Hazardous air pollutants (HAPs) usage shall be limited to less than ten (10) tons of any single hazardous air pollutant (HAP) and less than twenty-five (25) tons of any combination of HAPs per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the ink jet printers.

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

D.5.3 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP usage limitations contained in Condition D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-14.

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

D.5.4 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Condition D.5.1.

- (1) The VOC and HAP content of each ink and solvent used.

- (2) The amount of ink and solvent used less water on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total solvent usage for each month;
 - (4) The total VOC and HAP usage for each month; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.5 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the report forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the 'responsible official' as defined by 326 IAC 2-7-1(34).

SECTION D.6

FACILITY OPERATION CONDITIONS: Lithographic Presses

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

- (o) One (1) Heidelberg-Harris heatset web offset lithographic printing press with eight (8) units and two (2) webs identified as Press WM-401 with a maximum line speed of 1800 feet per minute and a maximum printing width of 38 inches, with associated in-line equipment and VOC emissions controlled by a regenerative thermal oxidizer, identified as RTO-1; and
- (p) One (1) Heidelberg-Harris heatset web offset lithographic printing press, identified as WM-402, with eight (8) units and two (2) webs, with a maximum speed of 3,000 feet per minute and a maximum printing width of 57 inches, with associated in-line equipment and VOC emissions controlled by recuperative thermal oxidizers, identified as IDO-1, integrated into the press dryers; and
- (q) One (1) Goss heatset web offset lithographic printing press, identified as WM-403, with eight (8) units and two (2) webs, with a maximum speed of 3,000 feet per minute and a maximum printing width of 57 inches, with associated in-line equipment and VOC emissions controlled by one (1) regenerative thermal oxidizer, identified as RTO-1.

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

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

D.6.1 Volatile Organic Compounds (VOCs) Limits [326 IAC 8-1-6]

- (a) Pursuant to 085-20472-00009 issued on April 18, 2005 and 326 IAC 8-1-6 (General Reduction Requirements), the Best Available Control Technology (BACT) for the one (1) heatset web offset lithographic presses, identified as WM-401, shall be as follows:
 - (1) The exhaust shall be vented to the Regenerative Thermal Oxidizer (RTO-1) with a minimum of 97% destruction efficiency for VOC;
 - (2) The VOC content of the Fountain solution shall be no greater than 3% VOC as applied;
 - (3) The blanket and roller washes shall have a vapor pressure no greater than 10 mm Hg at 20 ° C or the VOC content shall be limited to 2.5 lb/gal as applied; and
 - (4) The capture and retention efficiencies used for reporting compliance shall be as follows and are based on U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94):
 - (A) 100 percent capture, by weight, of the VOC in press ready inks;
 - (B) 70 percent capture, by weight, of the VOC in press ready fountain solutions;
 - (C) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents;
 - (D) 20 percent retention, by weight, of VOC in inks in the paper substrate; and

- (E) 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers. Cleaning wipers shall always be placed in closed containers after use.
- (b) Pursuant to SSM 085-28569-00009 and 326 IAC 8-1-6 (BACT), IDEM has determined that the best available control technology (BACT) to control VOC emissions from the two (2) proposed heatset web offset lithographic printing presses, identified as WM-402 and WM-403, shall be as follows:
- (1) The exhaust of Press WM-403 shall be vented to the Regenerative Thermal Oxidizer (RTO-1) with a minimum of 98% destruction efficiency for VOC;
 - (2) The exhaust of Press WM-402 shall be vented to the one (1) integrated recuperative thermal oxidizer (IDO-1) with a minimum of 98% destruction efficiency for VOC, as demonstrated by achieving a VOC outlet concentration of 50 ppmv C₁ or less;
 - (3) The VOC content of the fountain solution shall not exceed 3% VOC as applied;
 - (4) The blanket and roller washes shall have a vapor pressure no greater than 10 mmHg at 20°C or the VOC content shall be limited to 2.5 lb/gal as applied; and
 - (5) The capture and retention efficiencies used for reporting compliance shall be as follows and are based on U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994):
 - (A) 100% capture, by weight, of the VOC in press-ready inks;
 - (B) 70% capture, by weight, of the VOC in press-ready fountain solutions;
 - (C) 40% capture, by weight, of the VOC in press-ready automatic cleaning solvents;
 - (D) 20% retention, by weight, of VOC in inks in the paper substrate; and
 - (E) 50% retention, by weight, of manual cleaning solvents in the cleaning wipers. Cleaning wipers shall always be placed in closed containers after use.

Compliance with the above limits and conditions will satisfy the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6.

D.6.2 PSD Minor Limit [326 IAC 2-2]

-
- (a) Pursuant to Significant Permit Modification 085-20472-00009, issued on April 18, 2005, and as modified by Significant Permit Modification 085-28593-00009, the amount of VOC delivered to the substrate and the amount of VOC used for cleanup shall be limited such that the VOC emitted, after controls, is less than 39.6 tons from press WM-401 per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will render the requirements of 326 IAC 2-2 (PSD) not applicable.
 - (b) The amount of VOC delivered to the substrate and the amount of VOC used for cleanup shall be limited such that VOC emitted after controls, for both Press WM-402 and WM-403, is less than 39.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this emission limit will ensure that the potential to emit from this modification is less than forty (40) tons of VOC per year and therefore will render the requirements of 326 IAC 2-2 not applicable.

D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this permit, is required for the lithographic presses and their associated control devices.

Compliance Determination Requirements

D.6.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer, at all times when at least one of the two (2) lithographic presses (WM-402 and WM-403) is in operation, to achieve compliance with Conditions D.6.1 and D.6.2.
- (b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the integrated thermal oxidizer, identified as IDO-1, at all times Press WM-402 is in operation, to achieve compliance with Conditions D.6.1 and D.6.2.

D.6.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.6.1 and D.6.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets, Material Safety Data Sheets, or other VOC content information. 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.6.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) Within sixty (60) days after achieving maximum capacity but no later than one hundred eighty (180) days after initial startup of Press WM-403, the Permittee shall conduct a performance test to verify VOC destruction efficiency as per Condition D.6.1 for the one (1) thermal oxidizer identified as RTO-1, utilizing methods as approved by the Commissioner. This test 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.
- (b) Within sixty (60) days after achieving maximum capacity but no later than one hundred eighty (180) days after initial startup of Press WM-402, the Permittee shall conduct a performance test to verify VOC destruction efficiency as per Condition D.6.1 for the one (1) integrated dryer/oxidizer system identified as IDO-1, utilizing methods as approved by the Commissioner. This test 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.

D.6.7 VOC Emissions

Compliance with Condition D.6.2 shall be determined within thirty (30) days of the end of each month. This shall be based on total volatile organic compound emitted for the previous month, and adding it to the previous eleven (11) months total VOC emitted so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period.

- (a) The VOC emissions for a month can be arrived at using the following equation for usage on Press WM-401:

$$\text{VOC emitted} = [(\text{VOC input from inks}) \times (1 - 0.2^a) \times (1 - 0.97^b) + (\text{VOC input from fountain solution}) \times (1 - 0.7^c \times 0.97^b) + (\text{VOC input from automatic cleaning solvents}) \times (1 - 0.4^d \times 0.97^b)] + (\text{VOC from manual cleaning solvents}) \times (1 - 0.5^e)$$

- (b) The VOC emissions for a month can be arrived at using the following equation for usage on Press WM-403:

$$\text{VOC emitted} = [(\text{VOC input from inks}) \times (1 - 0.2^a) \times (1 - 0.98^b) + (\text{VOC input from fountain solution}) \times (1 - 0.7^c \times 0.98^b) + (\text{VOC input from automatic cleaning solvents}) \times (1 - 0.4^d \times 0.98^b)] + (\text{VOC from manual cleaning solvents}) \times (1 - 0.5^e)$$

- (c) The VOC emissions for one (1) month can be arrived at using the following equation for usage on Press WM-402:

$$\text{VOC emitted} = (1.22 \text{ lb/hr}^f \times \text{Press WM-402 operating hours}) + (\text{VOC input from fountain solution}) \times (1 - 0.7^c) + (\text{VOC input from automatic cleaning solvents}) \times (1 - 0.4^d) + (\text{VOC from manual cleaning solvents}) \times (1 - 0.5^e)$$

Where:

- (a) 20 percent retention, by weight, of VOC in inks in the paper substrate;
- (b) Percent thermal oxidizer destruction efficiency of VOC (97% for WM-401 and 98% for WM-403);
- (c) 70 percent capture, by weight, of the VOC in press ready fountain solutions;
- (d) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents;
- (e) 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers; and
- (f) Based on 50 ppmv C₁ maximum outlet concentration and 9,770 SCFM maximum air flow from IDO-1.

The Permittee shall use the destruction efficiency demonstrated from the most recent IDEM-approved stack test for RTO-1, the outlet concentration demonstrated from the most recent IDEM-approved stack test for IDO-1, and the capture and retention efficiencies listed in condition D.6.1.

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

D.6.8 Thermal Oxidizer Temperature [40 CFR 64 (CAM)]

-
- (a) The Permittee has determined the 3-hr average temperature of 1395°F from the most recent valid stack test, performed on October 2006, which demonstrates compliance with limits in Condition D.6.1(a), as approved by IDEM. From the date of issuance of this permit, Significant Permit Modification No. 085-28593-00009, until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hr average temperature of 1395°F.
 - (b) The Permittee shall determine the 3-hr average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.6.1, as approved by IDEM, for the integrated dryer/oxidizer system identified as IDO-1. On and after the date the approved stack test results are available, the Permittee shall operate the integrated dryer/oxidizer system at or above the 3-hr average temperature as observed during the compliant stack test.

- (c) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. For the purpose of this condition, continuous shall mean no less often than once per minute. The output of this system shall be recorded continuously except when there is a fluctuation in the temperature of the thermal oxidizer such that the temperature falls below 1395°F for the thermal oxidizer identified as RTO-1 or the temperature established in Condition D.6.8(b) for the integrated dryer/oxidizer system identified as IDO-1. At any time the temperature falls below 1395°F for RTO-1 or the temperature established in Condition D.6.8(b) for IDO-1, the Permittee shall record the output of the system as a 3-hr average for that period.

Compliance with this Condition satisfies the requirements of 40 CFR 64 (CAM) for presses WM-401, WM-402, and WM-403.

D.6.9 Parametric Monitoring [40 CFR 64 (CAM)]

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in condition D.6.1, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer identified as RTO-1 is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

Compliance with this Condition, in conjunction with Condition D.6.8, satisfies the requirements of 40 CFR 64 (CAM) for presses WM-401 and WM-403.

D.6.10 Parametric Monitoring [40 CFR 64 (CAM)]

- (a) The Permittee shall maintain a negative air flow pressure for the press dryers relative to the surrounding room as indicated by the differential pressure readings on the operator interface across the dryer inlets and outlets.
- (b) To demonstrate that a negative air flow pressure is achieved, the Permittee shall measure and record the differential pressure across the inlets and outlets of the press dryers at least once per day.
- (c) Maintaining a negative air flow pressure across the dryer inlets and outlets shall yield the following capture efficiencies:
- (1) 100 percent (100%) capture, by weight, of the VOC in press ready inks;
 - (2) 70 percent (70%) capture, by weight, of the VOC in press ready fountain solutions; and
 - (3) 40 percent (40%) capture, by weight, of the VOC in press ready automatic cleaning solvents.

Compliance with this Condition satisfies the requirements of 40 CFR 64 (CAM) for Press WM-402.

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

D.6.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.6.1 and D.6.2, the Permittee shall maintain records in accordance with (1) through (9) below. Records maintained for (1) through (9) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.6.1 and

D.6.2.

- (1) The VOC content of each ink, coating material, cleanup solvent and fountain solution used.
 - (2) The amount of ink and coating material used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The cleanup solvent usage for each month.
 - (4) The fountain solution usage for each month.
 - (5) Weight percent of VOC in fountain solution (wt %).
 - (6) The aggregate monthly VOC emissions and the annual VOC emissions.
 - (7) The continuous temperature records (on a 3-hr average basis whenever the temperature is not continuously above the minimum required temperature) for both the thermal oxidizer identified as RTO-1 and the dryer/oxidizer system identified as IDO-1 and the 3-hr average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (8) Daily records of the duct pressure or fan amperage.
 - (9) The number of operating hours for Press WM-402.
- (b) To document compliance with Conditions D.6.1 and D.6.2, the Permittee shall maintain records of the differential pressure across the dryer inlets and outlets as specified in Condition D.6.10.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.6.1 and D.6.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the report forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the 'responsible official' as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T 085-23864-00009

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:

Phone:

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**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T 085-23864-00009

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) |
| X 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 |
| X 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
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
PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T 085-23864-00009

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

Report period

Beginning: _____

Ending: _____

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

(can omit identification of boiler affected if only one gas boiler at this plant)

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:

Phone:

Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 PART 70 OPERATING PERMIT
 CHROMIUM ELECTROPLATING AND ANODIZING NESHAP
 ONGOING COMPLIANCE STATUS REPORT**

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
 Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
 Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
 Part 70 Permit No.: T 085-23864-00009
 Tank ID #: CR1 and CR2
 Type of process: Hard and Decorative
 Monitoring Parameter: Pressure drop
 Parameter Value: 4.6 ±2 inch of water
 Limits: Total chromium concentration may not exceed 0.015 mg/dscm

**This form is to be used to report compliance for the Chromium Electroplating and Anodizing NESHAP only.
 The frequency for completing this report may be altered by IDEM, OAQ, Compliance Branch.**

Companies classified as a major source:
Companies classified as an area source:

*Submit this report no later than 30 days after the end of the reporting period.
 Complete this report no later than 30 days after the end of the reporting period,
 and retain on site unless otherwise notified.*

This form consists of 2 pages

Page 1 of 2

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:
TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:

MAJOR AND AREA SOURCES: CHECK ONE
<input type="checkbox"/> NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.
<input type="checkbox"/> THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY: IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY: LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

CHROMIUM ELECTROPLATING AND ANODIZING NESHAP ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:

DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:

ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE

I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

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

Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T085-23864-00009
Facility: Press WRO-490
Parameter: Volatile Organic Compound (VOC) input
Limit: 4910 tons per 12 consecutive month period

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T085-23864-00009
Facility: Rotogravure Press WR-429
Parameter: Volatile Organic Compound Input
Limit: 34,550 ton per 12 consecutive month period

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY

COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T085-23864-00009
Facility: Presses WR-441, WR-442, and WR-443
Parameter: Volatile Organic Compounds Input
Limit: 9,468 tons per 12 consecutive month period

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T085-23864-00009
Facility: Press WR-444
Parameter: Volatile Organic Compounds Input
Limit: 3,120 tons per 12 consecutive month period

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T085-23864-00009
Facility: Boilers B1 and B2
Parameter: Combined SO₂ emissions
Limit: 245 tons per 12 consecutive month period

YEAR:

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

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

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY

COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T085-23864-00009
Facility: Boiler B4
Parameter: No. 2 Distillate Fuel Oil Input
Limit: 6192 kgal per 12 consecutive month period with a sulfur content not to exceed 0.05%

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T085-23864-00009
Facility: Boiler B4
Parameter: Natural Gas Input
Limit: 864 million cubic feet per 12 consecutive month period

YEAR:

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

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

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T085-23864-00009
Facility: Parts and Cylinder Washers, WGPW and WCWM
Parameter: Volatile Organic Compound Input
Limit: 500 tons per 12 consecutive month period

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY

COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T085-23864-00009
Facility: Three (3) waste paper concentrators (WPCON-3, WPCON-4, WPCON-5) and the two (2) cyclones (WPC-1 and WPC-2).
Parameter: Paper input
Limit: The input of paper to each of these processes shall be limited to less than 25,000 tons per 12 consecutive month period

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Paper Input This Month	Paper Input Previous 11 Months	Paper Input 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

Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T085-23864-00009
Facility: Cyclone EPC-1
Parameter: Waste paper input
Limit: 35,040 tons input of waste paper per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Tons Input This Month	Tons Input Previous 11 Months	Tons Input 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
 Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
 Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
 Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
 Part 70 Permit No.: T 085-23864-00009
 Facility: Eight (8) portable ink jet printers, identified as Ink Jet #1 through Ink Jet #8.
 Parameter: VOC and HAPs Usage
 Limit: (1) Volatile Organic Compounds (VOCs) usage shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month; and
 (2) Hazardous air pollutants (HAPs) usage shall be limited to less than ten (10) tons of any single hazardous air pollutant (HAP) less than twenty-five (25) tons of any combination of HAPs per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

YEAR:

Month	Column 1		Column 2		Column 1 + Column 2	
	VOC Emissions		VOC Emissions		VOC Emissions	
Month 1						
Month 2						
Month 3						

YEAR:

Month	Column 1		Column 2		Column 1 + Column 2	
	HAP Emissions		HAP Emissions		HAP Emissions	
	This Month		Previous 11 Month		12 Month Total	
	Single	Combined Total	Single	Combined Total	Single	Combined 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
 Part 70 Source Modification Quarterly Report**

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
 Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
 Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
 Part 70 Permit No.: T 085-23864-00009
 Facility: One (1) heatset web offset lithographic press identified as WM-401
 Parameter: VOC emissions
 Limit: The amount of VOC delivered to the substrate and the amount of VOC used for cleanup shall be limited such that the VOC emitted, after controls, is less than 39.6 tons from press WM-401 per twelve (12) consecutive month period. The following equation shall be used to determine the VOC emissions:

$$\text{VOC emitted} = [(\text{VOC input from inks}) \times (1 - 0.2^a) \times (1 - 0.97^b) + (\text{VOC input from fountain solution}) \times (1 - 0.7^c \times 0.97^b) + (\text{VOC input from automatic cleaning solvents}) \times (1 - 0.4^d \times 0.97^b)] + (\text{VOC from manual cleaning solvents}) \times (1 - 0.5^e)$$

- (a) 20 percent retention, by weight, of VOC in inks in the paper substrate;
- (b) Percent thermal oxidizer destruction efficiency of VOC (97% for WM-401);
- (c) 70 percent capture, by weight, of the VOC in press ready fountain solutions;
- (d) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents;
- (e) 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers;

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 Part 70 Source Modification Quarterly Report**

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
 Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
 Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
 Part 70 Permit No.: T 085-23864-00009
 Facility: Two (2) heatset web offset lithographic presses identified as WM-402 & WM-403
 Parameter: VOC emissions
 Limit: The amount of VOC delivered to the substrate and the amount of VOC used for cleanup shall be limited such that the VOC emitted, after controls, is less than 39.6 tons from presses WM-402 and WM-403 combined per twelve (12) consecutive month period.

The following equation shall be used to determine the VOC emissions from Press WM-402:

$$\text{VOC emitted} = (1.22 \text{ lb/hr}^f \times \text{Press WM-402 operating hours}) + (\text{VOC input from fountain solution}) \times (1 - 0.7^c) + (\text{VOC input from automatic cleaning solvents}) \times (1 - 0.4^d) + (\text{VOC from manual cleaning solvents}) \times (1 - 0.5^e)$$

The following equation shall be used to determine the VOC emissions from Press WM-403:

$$\text{VOC emitted} = [(\text{VOC input from inks}) \times (1 - 0.2^a) \times (1 - 0.98^b) + (\text{VOC input from fountain solution}) \times (1 - 0.7^c \times 0.98^b) + (\text{VOC input from automatic cleaning solvents}) \times (1 - 0.4^d \times 0.98^b)] + (\text{VOC from manual cleaning solvents}) \times (1 - 0.5^e)$$

Where:

- (a) 20 percent retention, by weight, of VOC in inks in the paper substrate;
- (b) Percent thermal oxidizer destruction efficiency of VOC (98% for WM-403);
- (c) 70 percent capture, by weight, of the VOC in press ready fountain solutions;
- (d) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents;
- (e) 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers; and
- (f) Based on 50 ppmv C₁ maximum outlet concentration and 9,770 SCFM maximum air flow from IDO-1.

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

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

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T085-23864-00009

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 for a Significant Source and Significant Permit
Modification

Source Name:	R.R. Donnelley & Sons Company
Source Location:	2801 West Old Road 30, Warsaw, Indiana 46581-0837
County:	Kosciusko
SIC Code:	2754
Operation Permit No.:	T085-23864-00009
Operation Permit Issuance Date:	December 18, 2008
Significant Source Modification No.:	085-28569-00009
Significant Permit Modification No.:	085-28593-00009
Permit Reviewer:	Stephanie Wilkerson

On December 29, 2009, the Office of Air Quality (OAQ) had a notice published in the Times Union in Warsaw, Indiana, stating that R.R. Donnelley & Sons Company had applied for a Significant Source and Significant Permit Modification for a stationary publication rotogravure printing operation. The notice also stated that OAQ proposed to issue a Significant Permit Modification for this operation and provided information on how the public could review the proposed significant modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this significant modification should be issued as proposed.

Comments from Ms. Debora Woodward of R.R. Donnelley & Sons Company were received regarding the issuance of this Significant Source and Significant Permit Modification. The summary of the comments and corresponding responses is as follows (**bold** language has been added and ~~struck~~ language has been deleted):

Comment: R.R. Donnelley & Sons Company believes Condition D.6.10 regarding pressure monitoring on Press WM-402 is unnecessary, inconsistent with the requirements for Presses WM-401 and WM-403, contrary to U.S. EPA-issued guidance regarding monitoring for lithographic printing presses, and also inconsistent with provisions within the Indiana regulations for lithographic printing.

Along with the comment above, the Permittee submitted information to the OAQ regarding the technical aspects and operation of Press WM-402. The integrated dryer/oxidizer system on the press is manufactured to operate at negative pressure relative to the surrounding pressroom, and has differential pressure sensors built into the inlet and the outlet of the dryer. These sensors ensure that the proper (negative) pressure is maintained within the dryer/oxidizer for safe and proper operation. The pressure is controlled, through the sensors, by a programmable logic controller (PLC) that adjusts the fresh air intake automatically. Through an "operator interface" that controls the entire press unit, the pressure may be checked periodically at the inlet and outlet of the dryers.

Response: Press WM-402 is subject to the requirements of Compliance Assurance Monitoring (CAM), 40 CFR 64, and the requirement to maintain and monitor negative pressure within the press dryer/oxidizer is necessary to assure compliance with the emissions requirements set forth in the permit.

The integrated dryer/oxidizer in Press WM-402 is unique, and requires different requirements than the more conventional press dryers that are routed to a separate thermal oxidizer (i.e., Presses WM-401 and WM-403).

The guidance from the U.S. EPA regarding capture efficiency testing for heatset web offset lithographic printing presses states that a periodic check of the airflow to confirm capture conditions are maintained is required, and lists pressure monitors as a method to do so. The Significant Source and Permit Modifications do not require continuous monitoring, only periodic checks (at least once per day), as the guidance issued by the U.S. EPA suggests.

The Indiana regulations cited in the comment are Reasonable Achievable Control Technology (RACT) rules set forth for counties other than that in which the Permittee operates. Additionally, as the press in question is subject to the requirements of Best Available Control Technology (BACT), compliance monitoring requirements beyond those in the RACT rules are to be expected.

To incorporate the operator interface rather than differential pressure gauges, the following changes are made to the permit:

D.6.10 Parametric Monitoring [40 CFR 64 (CAM)]

- (a) The Permittee shall maintain a negative air flow pressure for the press dryers relative to the surrounding room as indicated by **the differential pressure gauges readings on the operator interface** across the dryer inlets and outlets.
- (b) To demonstrate that a negative air flow pressure is achieved, the Permittee shall ~~install differential pressure gauges at each of the dryer inlets and outlets, and~~ measure and record the differential pressure across the inlets and outlets of the press dryers at least once per day.

...

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

**Technical Support Document (TSD) for a Part 70 Significant Source and
Significant Permit Modification**

Source Description and Location

Source Name:	R.R. Donnelley & Sons Company
Source Location:	2801 West Old Road 30, Warsaw, Indiana 46581-0837
County:	Kosciusko
SIC Code:	2754
Operation Permit No.:	T085-23864-00009
Operation Permit Issuance Date:	December 18, 2008
Interim Significant Source Modification No.:	085-28569I-00009
Significant Source Modification No.:	085-28569-00009
Significant Permit Modification No.:	085-28593-00009
Permit Reviewer:	Stephanie Wilkerson

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 085-23864-00009 on December 18, 2008. There have been no other approvals issued to the source since that date.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment as of June 15, 2004, 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 September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph Counties as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Hamilton, Hancock, Hendricks,

Johnson, Madison, Marion, Morgan, and Shelby Counties as attainment for the 8-hour ozone standard.

- (4) 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. Kosciusko 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}**
 Kosciusko 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 is July 15, 2008. Indiana has three (3) 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**
 Kosciusko 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**
 Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Source Status

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

Pollutant	Emissions (ton/yr)
PM	>250
PM ₁₀	>250
PM _{2.5}	>250
SO ₂	76.90
VOC	>250
CO	127.40
NO _x	216.70

HAPs	Potential To Emit (ton/yr)
Chromium	<10
Xylene	>10
Toluene	>10
Total	>25

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

- (b) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based upon the Technical Support Document (TSD) for Part 70 Operating Permit Renewal No. 085-23864-00009, issued on December 18, 2008.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by R.R. Donnelley & Sons Company, on October 13, 2009, relating to the addition of two (2) heatset web offset lithographic printing presses. The following is a list of the proposed emission units and pollution control devices:

- (a) One (1) Heidelberg-Harris heatset web offset lithographic printing press, identified as WM-402, with eight (8) units and two (2) webs, with a maximum speed of 3,000 feet per minute and a maximum printing width of 57 inches, with associated in-line equipment and VOC emissions controlled by recuperative thermal oxidizers, identified as IDO-1, integrated into the press dryers; and
- (b) One (1) Goss heatset web offset lithographic printing press, identified as WM-403, with eight (8) units and two (2) webs, with a maximum speed of 3,000 feet per minute and a maximum printing width of 57 inches, with associated in-line equipment and VOC emissions controlled by one (1) regenerative thermal oxidizer, identified as RTO-1.

Additionally, the application requested the removal of one (1) printing press that was permitted but never installed. The following emission unit will be removed from the permit:

- (c) One (1) Goss heatset web offset lithographic printing press with eight (8) units and two (2) webs identified as Press WM-402 with a maximum speed of 2500 feet per minute and a maximum printing width of 38 inches, with associated in-line equipment and VOC emissions controlled by a regenerative thermal oxidizer, identified as RTO-1.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix B of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	-
PM ₁₀	-
PM _{2.5}	-
SO ₂	-
VOC	1677.86
CO	-
NO _x	-

HAP PTE Before Controls of the Modification	
HAPs	Potential To Emit (ton/yr)
Butyl carbitol	2.43
TOTAL	2.43

This source modification is subject to 326 IAC 2-7-10.5(f)(2), as it is subject to the requirements of 326 IAC 8-1-6 (Best Available Control Technology (BACT)). Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the modification requires a case-by-case determination of emission limitations.

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 significant source and significant permit modification, 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 (ton/yr)					
	PM	PM₁₀	SO₂	VOC	CO	NO_x
WM-402	-	-	-	39.6	-	-
WM-403	-	-	-		-	-
Total for Modification	-	-	-	<40	-	-
Significant Level	25	15	40	40	100	40

Since this source is considered a major PSD source and the unrestricted potential to emit of this modification is greater than forty (40) tons of VOC per year, this source has elected to limit the potential to emit of this modification as follows:

- (a) The amount of VOC delivered to the substrate and the amount of VOC used for cleanup shall be limited such that VOC emitted after controls, for both Press WM-402 and WM-403, is less than 39.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this emission limit will ensure that the potential to emit from this modification is less than forty (40) tons of VOC per year and therefore will render the requirements of 326 IAC 2-2 not applicable.

Federal Rule Applicability Determination

NSPS:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed:
- (1) The two (2) proposed printing presses are not subject to the requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing (40 CFR 60, Subpart QQ), as these presses are lithographic presses, and not publication rotogravure printing presses. Therefore, these requirements are not included in this modification.
 - (2) The two (2) proposed printing presses are not subject to the requirements of the New Source Performance Standard for Flexible Vinyl and Urethane Coating and Printing (40 CFR 60, Subpart FFF), because this rule is applicable to rotogravure printing lines, not lithographic presses. Therefore, these requirements are not included in this modification.
 - (3) The two (2) proposed printing presses are not subject to the requirements of the New Source Performance Standard for Polymeric Coating of Supporting Substrates Facilities (40 CFR 60, Subpart VVV). Pursuant to 40 CFR 60.740(d)(3), web coating operations that print an image onto the surface of the substrate are not subject to this rule. Therefore, these requirements are not included in this modification.

NESHAP:

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification:
- (1) The two (2) proposed printing presses are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) the Printing and Publishing Industry (40 CFR 63, Subpart KK). Pursuant to 40 CFR 63.820(a)(1), this rule applies to the operation of publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses, not lithographic printing processes. Therefore, these requirements are not included in this modification.
 - (2) The two (2) proposed printing presses are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paper and Other Web Coating (40 CFR 63, Subpart JJJJ). Pursuant to 40 CFR 63.3300(c), lithographic printing processes are not subject to this rule. Therefore, these requirements are not included in this modification.
 - (3) The two (2) proposed printing presses are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Printing, Coating, and Dyeing of Fabrics and Other Textiles (40 CFR 63, Subpart OOOO), as these presses do not coat fabrics or textiles. Therefore, these requirements are not included in this modification.
- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each new or modified pollutant-specific emission unit that meets the following criteria:

- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Press WM-402 - VOC	Y	Y	838.93	16.78	100	Y	N
Press WM-402 - HAP	Y	N	1.22	0.02	10/25	N	N
Press WM-403 - VOC	Y	Y	838.93	16.78	100	Y	N
Press WM-403 - HAP	Y	N	1.22	0.02	10/25	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to both Press WM-402 and WM-403 for VOC at renewal. A CAM plan has been submitted and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

State Rule Applicability Determination

326 IAC 2-2 (PSD)

PSD applicability is discussed under the Permit Level Determination – PSD section.

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

The operation of each proposed printing press will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

The potential to emit VOC from each proposed printing press is greater than twenty-five (25) tons per year. Therefore, the operation of the two (2) presses, identified as WM-402 and WM-403, is subject to the requirements of 326 IAC 8-1-6 (BACT). A detailed BACT analysis is included as a Appendix A to this Technical Support Document.

Pursuant to 326 IAC 8-1-6 (BACT), IDEM has determined that the best available control technology (BACT) to control VOC emissions from the two (2) proposed heatset web offset lithographic printing presses, identified as WM-402 and WM-403, shall be as follows:

- (a) The exhaust of Press WM-403 shall be vented to the Regenerative Thermal Oxidizer (RTO-1) with a minimum of 98% destruction efficiency for VOC;
- (b) The exhaust of Press WM-402 shall be vented to the one (1) integrated recuperative thermal oxidizer (IDO-1) with a minimum of 98% destruction efficiency for VOC, as demonstrated by achieving a VOC outlet concentration of 50 ppmv C₁ or less;

- (c) The VOC content of the fountain solution shall not exceed 3% VOC as applied;
- (d) The blanket and roller washes shall have a vapor pressure no greater than 10 mmHg at 20°C or the VOC content shall be limited to 2.5 lb/gal as applied; and
- (e) The capture and retention efficiencies used for reporting compliance shall be as follows and are based on U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994):
 - (1) 100% capture, by weight, of the VOC in press-ready inks;
 - (2) 70% capture, by weight, of the VOC in press-ready fountain solutions;
 - (3) 40% capture, by weight, of the VOC in press-ready automatic cleaning solvents;
 - (4) 20% retention, by weight, of VOC in inks in the paper substrate; and
 - (5) 50% retention, by weight, of manual cleaning solvents in the cleaning wipers. Cleaning wipers shall always be placed in closed containers after use.

Compliance with the above limits and conditions will satisfy the requirements of 326 IAC 8-1-6 (BACT).

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. 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.

Changes to the compliance determination and monitoring requirements are detailed in the Proposed Changes section of this document.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit Renewal No. 085-23864-00009. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**. The Table of Contents has been updated as necessary without duplication herein.

Modification No. 1: The two (2) printing presses, identified as WM-402 and WM-403, are added to Condition A.2 and Section D.6. The one (1) printing press previously permitted but never installed, also identified as WM-402, has been removed from those, as follows:

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

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

...

- ~~(p) One (1) Goss heatset web offset lithographic printing press with eight (8) units and two (2) webs identified as Press WM-402 with a maximum speed of 2500 feet per minute and a maximum printing width of 38 inches, with associated in-line equipment and VOC emissions controlled by a regenerative thermal oxidizer, identified as RTO-1.~~
- (p) One (1) Heidelberg-Harris heatset web offset lithographic printing press, identified as WM-402, with eight (8) units and two (2) webs, with a maximum speed of 3,000 feet per minute and a maximum printing width of 57 inches, with associated in-line equipment and VOC emissions controlled by recuperative thermal oxidizers, identified as IDO-1, integrated into the press dryers; and**
- (q) One (1) Goss heatset web offset lithographic printing press, identified as WM-403, with eight (8) units and two (2) webs, with a maximum speed of 3,000 feet per minute and a maximum printing width of 57 inches, with associated in-line equipment and VOC emissions controlled by one (1) regenerative thermal oxidizer, identified as RTO-1.**

...

SECTION D.6

FACILITY OPERATION CONDITIONS: Lithographic Presses

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

- (o) One (1) Heidelberg-Harris heatset web offset lithographic printing press with eight (8) units and two (2) webs identified as Press WM-401 with a maximum line speed of 1800 feet per minute and a maximum printing width of 38 inches, with associated in-line equipment and VOC emissions controlled by a regenerative thermal oxidizer, identified as RTO-1; and
- ~~(p) One (1) Goss heatset web offset lithographic printing press with eight (8) units and two (2) webs identified as Press WM-402 with a maximum speed of 2500 feet per minute and a maximum printing width of 38 inches, with associated in-line equipment and VOC emissions controlled by a regenerative thermal oxidizer, identified as RTO-1.~~
- (p) One (1) Heidelberg-Harris heatset web offset lithographic printing press, identified as WM-402, with eight (8) units and two (2) webs, with a maximum speed of 3,000 feet per minute and a maximum printing width of 57 inches, with associated in-line equipment and VOC emissions controlled by recuperative thermal oxidizers, identified as IDO-1, integrated into the press dryers; and**
- (q) One (1) Goss heatset web offset lithographic printing press, identified as WM-403, with eight (8) units and two (2) webs, with a maximum speed of 3,000 feet per minute and a maximum printing width of 57 inches, with associated in-line equipment and VOC emissions controlled by one (1) regenerative thermal oxidizer, identified as RTO-1.**

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

Modification No. 2: The BACT conditions for the two (2) proposed presses are incorporated into Section D.6 as follows. Please note that the BACT conditions for previously permitted press WM-401 have not been changed, and the previously permitted but never installed press WM-402 has been removed.

...

D.6.1 Volatile Organic Compounds (VOCs) Limits [326 IAC 8-1-6]

- (a)** Pursuant to 085-20472-00009 issued on April 18, 2005 and 326 IAC 8-1-6 (General Reduction Requirements), the Best Available Control Technology (BACT) for the ~~two (2)~~ **one (1)** heatset web offset lithographic presses, identified as WM-401 and ~~WM-402~~, shall be as follows:
- (a1)** The exhaust shall be vented to the Regenerative Thermal Oxidizer (RTO-1) with a minimum of 97% destruction efficiency for VOC;
 - (b2)** The VOC content of the Fountain solution shall be no greater than 3% VOC as applied;
 - (c3)** The blanket and roller washes shall have a vapor pressure no greater than 10 mm Hg at 20 °C or the VOC content shall be limited to 2.5 lb/gal as applied; and
 - (d4)** The capture and retention efficiencies used for reporting compliance shall be as follows and are based on USEPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94):
 - (1A)** 100 percent capture, by weight, of the VOC in press ready inks;
 - (2B)** 70 percent capture, by weight, of the VOC in press ready fountain solutions;
 - (3C)** 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents;
 - (4D)** 20 percent retention, by weight, of VOC in inks in the paper substrate; and
 - (5E)** 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers. Cleaning wipers shall always be placed in closed containers after use.
- (b)** Pursuant to SSM 085-28569-00009 and 326 IAC 8-1-6 (BACT), IDEM has determined that the best available control technology (BACT) to control VOC emissions from the two (2) proposed heatset web offset lithographic printing presses, identified as WM-402 and WM-403, shall be as follows:
- (1)** The exhaust of Press WM-403 shall be vented to the Regenerative Thermal Oxidizer (RTO-1) with a minimum of 98% destruction efficiency for VOC;
 - (2)** The exhaust of Press WM-402 shall be vented to the one (1) integrated recuperative thermal oxidizer (IDO-1) with a minimum of 98% destruction efficiency for VOC, as demonstrated by achieving a VOC outlet concentration of 50 ppmv C₁ or less;

- (3) **The VOC content of the fountain solution shall not exceed 3% VOC as applied;**
- (4) **The blanket and roller washes shall have a vapor pressure no greater than 10 mmHg at 20°C or the VOC content shall be limited to 2.5 lb/gal as applied; and**
- (5) **The capture and retention efficiencies used for reporting compliance shall be as follows and are based on U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994):**
 - (A) **100% capture, by weight, of the VOC in press-ready inks;**
 - (B) **70% capture, by weight, of the VOC in press-ready fountain solutions;**
 - (C) **40% capture, by weight, of the VOC in press-ready automatic cleaning solvents;**
 - (D) **20% retention, by weight, of VOC in inks in the paper substrate; and**
 - (E) **50% retention, by weight, of manual cleaning solvents in the cleaning wipers. Cleaning wipers shall always be placed in closed containers after use.**

Compliance with the above limits and conditions will satisfy the Best Available Control ~~technology~~ **Technology** (BACT) requirements of 326 IAC 8-1-6.

Modification No. 3: The PSD Minor Limit for the two (2) proposed printing presses, identified as WM-402 and WM-403, is incorporated into Condition D.6.2 as follows. Additionally, the press previously permitted but never installed (WM-402) has been removed.

...

D.6.2 PSD Minor Limit [326 IAC 2-2]

- (a) Pursuant to Significant Permit Modification 085-20472-00009, issued on April 18, 2005, **and as modified by Significant Permit Modification 085-28593-00009**, the amount of VOC delivered to the substrate and the amount of VOC used for cleanup shall be limited such that the VOC emitted, after controls, is less than 39.6 tons from presses WM-401 and ~~WM-402 combined~~ per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will render the requirements of 326 IAC 2-2 (PSD) not applicable.
- (b) **The amount of VOC delivered to the substrate and the amount of VOC used for cleanup shall be limited such that VOC emitted after controls, for both Press WM-402 and WM-403, is less than 39.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

Compliance with this emission limit will ensure that the potential to emit from this modification is less than forty (40) tons of VOC per year and therefore will render the requirements of 326 IAC 2-2 not applicable.

Modification No. 4: A typographical error in Condition D.6.3 has been corrected as follows:

...

D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the lithographic presses **and** their associated control devices.

Modification No. 5: The Compliance Determination Requirements for Section D.6 have been updated to remove the previously permitted press WM-402 and to include the two (2) proposed presses, identified as WM-402 and WM-403, as follows:

...

D.6.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

(a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer, at all times when at least one of the two (2) lithographic presses (WM-401 and ~~WM-402~~ **WM-403**) is in operation, to achieve compliance with ~~condition~~ **Conditions D.6.1 and D.6.2.**

(b) Pursuant to **326 IAC 8-1-2(a), the Permittee shall operate the integrated thermal oxidizer, identified as IDO-1, at all times Press WM-402 is in operation, to achieve compliance with Conditions D.6.1 and D.6.2.**

D.6.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.6.1 and D.6.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets, Material Safety Data Sheets, or other VOC content information. 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.6.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) Within sixty (60) days after achieving maximum capacity but no later than one hundred eighty (180) days after initial startup **of Press WM-403**, the Permittee shall conduct a performance test to verify VOC destruction efficiency as per ~~condition~~ **Condition D.6.1** for the **one (1)** thermal oxidizer **identified as RTO-1**, utilizing methods as approved by the Commissioner. This test 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.

(b) **Within sixty (60) days after achieving maximum capacity but no later than one hundred eighty (180) days after initial startup of Press WM-402, the Permittee shall conduct a performance test to verify VOC destruction efficiency as per Condition D.6.1 for the one (1) integrated dryer/oxidizer system identified as IDO-1, utilizing methods as approved by the Commissioner. This test 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.**

D.6.7 VOC Emissions

Compliance with Condition D.6.2 shall be determined within **thirty (30)** days of the end of each month. This shall be based on total volatile organic compound emitted for the previous month, and adding it to the previous **eleven (11)** months total VOC emitted so as to arrive at VOC emissions for the most recent **twelve (12)** consecutive month period.

(a) The VOC emissions for a month can be arrived at using the following equation for usage **on Press WM-401:**

VOC emitted = [(VOC input from inks) x (1 - 0.2^a) x (1 - 0.97^b) + (VOC input from fountain solution) x (1 - 0.7^c x 0.97^b) + (VOC input from automatic cleaning solvents) x (1 - 0.4^d x 0.97^b)] + (VOC from manual cleaning solvents) x (1-0.5^e)

- (b) The VOC emissions for a month can be arrived at using the following equation for usage on Press WM-403:

VOC emitted = [(VOC input from inks) x (1 - 0.2^a) x (1 - 0.98^b) + (VOC input from fountain solution) x (1 - 0.7^c x 0.98^b) + (VOC input from automatic cleaning solvents) x (1 - 0.4^d x 0.98^b)] + (VOC from manual cleaning solvents) x (1-0.5^e)

- (c) The VOC emissions for one (1) month can be arrived at using the following equation for usage on Press WM-402:

VOC emitted = (1.22 lb/hr^f x Press WM-402 operating hours) + (VOC input from fountain solution) x (1-0.7^c) + (VOC input from automatic cleaning solvents) x (1-0.4^d) + (VOC from manual cleaning solvents) x (1-0.5^e)

Where:

- (a) 20 percent retention, by weight, of VOC in inks in the paper substrate;
- (b) 97 Percent **thermal oxidizer** destruction efficiency of VOC (**97% for WM-401 and 98% for WM-403**);
- (c) 70 percent capture, by weight, of the VOC in press ready fountain solutions;
- (d) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents;
- (e) 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers; **and**
- (f) **Based on 50 ppmv C₁ maximum outlet concentration and 9.770 SCFM maximum air flow from IDO-1.**

The Permittee shall use the destruction efficiency demonstrated from the most recent **IDEM-approved** stack test for RTO-1, the outlet concentration demonstrated from the most recent **IDEM-approved** stack test for IDO-1, and the capture and retention efficiencies listed in condition D.6.1(d).

Modification No. 6: The Compliance Monitoring Requirements for Section D.6 have been updated as follows:

...

D.6.8 Thermal Oxidizer Temperature [40 CFR 64 (CAM)]

- (a) The Permittee has determined the 3-hr average temperature of 1395°F from the most recent valid stack test, performed on October 2006, which demonstrates compliance with limits in ~~condition~~ **Condition D.6.1(a)**, as approved by IDEM. **From the date of issuance of this permit, Significant Permit Modification No. 085-28569-00009, until the approved stack test results are available,** The the Permittee shall operate the thermal oxidizer at or above the 3-hr average temperature ~~as observed during the last compliant stack test of 1395°F.~~
- (b) **The Permittee shall determine the 3-hr average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.6.1, as**

approved by IDEM, for the integrated dryer/oxidizer system identified as IDO-1. On and after the date the approved stack test results are available, the Permittee shall operate the integrated dryer/oxidizer system at or above the 3-hr average temperature as observed during the compliant stack test.

- (bc) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. For the purpose of this condition, continuous shall mean no less often than once per minute. The output of this system shall be recorded continuously except when there is a fluctuation in the temperature of the thermal oxidizer such that the temperature falls below 1395 °F **for the thermal oxidizer identified as RTO-1 or the temperature established in Condition D.6.8(b) for the integrated dryer/oxidizer system identified as IDO-1.** At any time the temperature falls below 1395°F **for RTO-1 or the temperature established in Condition D.6.8(b) for IDO-1,** the Permittee shall record the output of the system as a 3-hr average for that period. ~~From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hr average temperature of 1395 °F.~~

Compliance with this Condition satisfies the requirements of 40 CFR 64 (CAM) for presses WM-401, WM-402, and WM-403.

D.6.9 Parametric Monitoring [40 CFR 64 (CAM)]

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in condition D.6.1, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer **identified as RTO-1** is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

Compliance with this Condition, in conjunction with Condition D.6.8, satisfies the requirements of 40 CFR 64 (CAM) for presses WM-401 and WM-403.

D.6.10 Parametric Monitoring [40 CFR 64 (CAM)]

- (a) **The Permittee shall maintain a negative air flow pressure for the press dryers relative to the surrounding room as indicated by differential pressure gauges across the dryer inlets and outlets.**
- (b) **To demonstrate that a negative air flow pressure is achieved, the Permittee shall install differential pressure gauges at each of the dryer inlets and outlets, and measure and record the differential pressure across the inlets and outlets of the press dryers at least once per day.**
- (c) **Maintaining a negative air flow pressure across the dryer inlets and outlets shall yield the following capture efficiencies:**
- (1) **100 percent (100%) capture, by weight, of the VOC in press ready inks;**
 - (2) **70 percent (70%) capture, by weight, of the VOC in press ready fountain solutions; and**
 - (3) **40 percent (40%) capture, by weight, of the VOC in press ready automatic cleaning solvents.**

Compliance with this Condition satisfies the requirements of 40 CFR 64 (CAM) for Press WM-402.

Modification No. 7: The Record Keeping and Reporting Requirements for Section D.6 have been modified to include the two (2) proposed presses as follows:

...

D.6.1011 Record Keeping Requirements

- (a) To document compliance with Conditions D.6.1 and D.6.2, the Permittee shall maintain records in accordance with (1) through ~~(8)~~ below. Records maintained for (1) through ~~(8)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.6.1 and D.6.2.
- (1) The VOC content of each ink, coating material, cleanup solvent and fountain solution used.
 - (2) The amount of ink and coating material used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The cleanup solvent usage for each month.
 - (4) The fountain solution usage for each month.
 - (5) Weight percent of VOC in fountain solution (wt %).
 - (6) The aggregate monthly VOC emissions and the annual VOC emissions.
 - (7) The continuous temperature records (on a 3-hr average basis whenever the temperature is not continuously above the minimum required temperature) for **both** the thermal oxidizer **identified as RTO-1 and the dryer/oxidizer system identified as IDO-1** and the 3-hr average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (8) Daily records of the duct pressure or fan amperage.
 - (9) The number of operating hours for Press WM-402.**
- (b) **To document compliance with Conditions D.6.1 and D.6.2, the Permittee shall maintain records of the differential pressure across the dryer inlets and outlets as specified in Condition D.6.10.**
- (bc) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.1112 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.6.1 and D.6.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the report forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the 'responsible official' as defined by 326 IAC 2-7-1(34).

Modification No. 8: The following changes have been made to the Quarterly Reports to remove the one (1) previously permitted, but never installed, printing press, identified as WM-402:

...

**OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 Part 70 Source Modification Quarterly Report**

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
 Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
 Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
 Part 70 Permit No.: T 085-23864-00009
 Facility: ~~Two (2)~~ **One (1)** heatset web offset lithographic presses identified as WM-401 & ~~WM-402~~
 Parameter: VOC emissions
 Limit: The amount of VOC delivered to the substrate and the amount of VOC used for cleanup shall be limited such that the VOC emitted, after controls, is less than 39.6 tons from presses WM-401 and ~~WM-402 combined~~ per twelve (12) consecutive month period. The following equation shall be used to determine the VOC emissions:

$$\text{VOC emitted} = [(\text{VOC input from inks}) \times (1 - 0.2^{1a}) \times (1 - 0.97^{2b}) + (\text{VOC input from fountain solution}) \times (1 - 0.7^{3c} \times 0.97^{2b}) + (\text{VOC input from automatic cleaning solvents}) \times (1 - 0.4^{4d} \times 0.97^{2b})] + (\text{VOC from manual cleaning solvents}) \times (1 - 0.5^{5e})$$

- ~~1-(a)~~ 20 percent retention, by weight, of VOC in inks in the paper substrate;
- ~~2-(b)~~ **97 Percent thermal oxidizer** destruction efficiency of VOC (**97% for WM-401**);
- ~~3-(c)~~ 70 percent capture, by weight, of the VOC in press ready fountain solutions;
- ~~4-(d)~~ 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents;
- ~~5-(e)~~ 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers;

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.

Modification No. 9: The following addition has been made to the Quarterly Reports to incorporate the two (2) proposed printing presses, WM-402 and WM-403:

...

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 Part 70 Source Modification Quarterly Report**

Source Name: R.R. Donnelley & Sons Company – Warsaw Manufacturing Division
Source Address: 2801 West Old Road U.S. 30, Warsaw, Indiana 46581-0837
Mailing Address: 2801 West Old Road U.S. 30, P.O. Box 837, Warsaw, Indiana 46581-0837
Part 70 Permit No.: T 085-23864-00009
Facility: Two (2) heatset web offset lithographic presses identified as WM-402 & WM-403
Parameter: VOC emissions
Limit: The amount of VOC delivered to the substrate and the amount of VOC used for cleanup shall be limited such that the VOC emitted, after controls, is less than 39.6 tons from presses WM-402 and WM-403 combined per twelve (12) consecutive month period.

The following equation shall be used to determine the VOC emissions from Press WM-402:

$$\text{VOC emitted} = (1.22 \text{ lb/hr}^f \times \text{Press WM-402 operating hours}) + (\text{VOC input from fountain solution}) \times (1 - 0.7^c) + (\text{VOC input from automatic cleaning solvents}) \times (1 - 0.4^d) + (\text{VOC from manual cleaning solvents}) \times (1 - 0.5^e)$$

The following equation shall be used to determine the VOC emissions from Press WM-403:

$$\text{VOC emitted} = [(\text{VOC input from inks}) \times (1 - 0.2^a) \times (1 - 0.98^b) + (\text{VOC input from fountain solution}) \times (1 - 0.7^c \times 0.98^b) + (\text{VOC input from automatic cleaning solvents}) \times (1 - 0.4^d \times 0.98^b)] + (\text{VOC from manual cleaning solvents}) \times (1 - 0.5^e)$$

Where:

- (a) 20 percent retention, by weight, of VOC in inks in the paper substrate;
- (b) Percent thermal oxidizer destruction efficiency of VOC (98% for WM-403);
- (c) 70 percent capture, by weight, of the VOC in press ready fountain solutions;
- (d) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents;
- (e) 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers; and
- (f) Based on 50 ppmv C₁ maximum outlet concentration and 9,770 SCFM maximum air flow from IDO-1.

YEAR:

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on:

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

Attach a signed certification to complete this report.

Modification 10: Several of the IDEM, OAQ, branches and sections have been renamed. Therefore, the addresses listed in the permit will be updated as follows:

References to the Permit Administration and Development Section and the Permits Branch have been changed to "Permit Administration and Support Section". References to the Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to "Compliance and Enforcement Branch".

**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**

**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**

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 085-28593-00009 and Significant Permit Modification No. 085-28569-00009. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

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

**APPENDIX A
BEST AVAILABLE CONTROL TECHNOLOGY (BACT)
ANALYSIS REPORT**

Source Description and Location

Source Name:	R.R. Donnelley & Sons Company
Source Location:	2801 West Old Road 30, Warsaw, Indiana 46581-0837
County:	Kosciusko
SIC Code:	2754
Operation Permit No.:	T085-23864-00009
Operation Permit Issuance Date:	December 18, 2008
Interim Significant Source Modification No.:	085-28569I-00009
Significant Source Modification No.:	085-28569-00009
Significant Permit Modification No.:	085-28593-00009
Permit Reviewer:	Stephanie Wilkerson

Background Information

The Office of Air Quality (OAQ) has reviewed the significant source modification and significant permit modification application from R.R. Donnelley & Sons Company, relating to the operation of a stationary publication rotogravure printing operation. On October 13, 2009, R.R. Donnelley & Sons Company submitted an application to the OAQ requesting to construct and operate two (2) heatset web offset lithographic printing presses, identified as WM-402 and WM-403. R.R. Donnelley & Sons Company was issued Part 70 Operating Permit Renewal T085-23864-00009 on December 18, 2008.

The potential VOC emissions of the two (2) proposed printing presses are greater than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 (Best Available Control Technology (BACT)) are applicable to this modification.

IDEM, OAQ conducts BACT analyses in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft U.S. EPA *New Source Review Workshop Manual*, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below.

- (a) Identify all potentially available control options;
- (b) Eliminate technically infeasible control options;
- (c) Rank remaining control technologies;
- (d) Evaluate the most effective controls and document the results; and
- (e) Select BACT.

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

VOC BACT Analysis

Step One: Identify All Control Technologies

The following control technologies were evaluated in regards to controlling VOC emissions from the two (2) proposed heatset web offset lithographic printing presses:

(a) Thermal Oxidation

Thermal oxidation systems operate in three (3) stages: a burner generates hot combustion gases, combustion products mix with the exhaust from the process lines, and the mixture is oxidized. Thermal incinerators operate at peak efficiency when oxidizing concentrated organic exhaust streams just above or below the upper and lower explosive limits. This is because the oxidation rate is directly proportional to the organic concentration, the local heat of reaction during oxidation, and the increased concentration of free radicals which participate in the oxidation reaction. Thermal oxidation destruction efficiency ranges from 95 to 99%.

(b) Catalytic Oxidation

Catalytic oxidation systems operate in three stages: a burner generates hot combustion gases, combustion products mix with the fume (VOC vapors), and the mixture is passed through a non-participating media (catalyst) for a specific period of time. VOC destruction efficiency is dependent upon VOC composition and concentration, operating temperature, oxygen concentration, and catalyst characteristics. Catalytic oxidation is most suited to systems with lower exhaust volumes, when there is little variation in the type and concentration of VOC, and where catalyst poisons or other fouling contaminants are not present. Higher destruction efficiencies of 98 - 99% are achievable, but require larger catalyst volumes and/or higher temperatures, and are usually designed on a site specific basis (EPA, 1991).

Step Two: Evaluate Technical Feasibility

To be considered technically feasible, a control technology must either be successfully demonstrated on a unit or, if not demonstrated, then be "available and applicable". A technology is considered "available" if it can be obtained by the applicant through commercial channels. An available technology is considered "applicable" if it can reasonably be installed and operated on the unit in question.

The feasibility of each of the potentially applicable control options identified is reviewed below.

(a) Thermal Oxidation

Thermal oxidation is a technically feasible option. The source has thermal oxidizers in place for current operations, and one (1) of the proposed presses has a thermal oxidizer integrated into the drying system.

(b) Catalytic Oxidation

Catalytic oxidation is not a technically feasible option. The source continually changes its coating formulations, with each new formulation likely having catalyst fouling characteristics.

The following table summarizes other BACT determinations at similar sources or on similar processes:

Company/Location	Year Issued	Process Description	BACT Emission Limits/Requirements	Reference
R.R. Donnelley & Sons Company - Crawfordsville, IN	2007	Printing presses	Thermal oxidizer with 97% destruction efficiency, fountain solution with no more than 5% VOC, and cleaning solvent with less than 10 mmHg vapor pressure or 2.5 lb VOC/gal	Indiana Title V Permit No. 107-23347-00052
R.R. Donnelley & Sons Company - Warsaw, IN	2005	Printing presses	Thermal oxidizer with 97% destruction efficiency, fountain solution with no more than 5% VOC, and cleaning solvent with less than 10 mmHg vapor pressure or 2.5 lb VOC/gal	Indiana Title V Permit Modification No: 085-20472-00009
R.R. Donnelley & Sons Company - Lancaster, PA	2006	Printing presses	Thermal oxidizer with 97% destruction efficiency	RBLC ID: PA-0261
Courier Kendallville, Inc. - Kendallville, IN	2006	Printing presses	Integrated thermal oxidizer with minimum of 98% destruction efficiency as demonstrated by an outlet VOC concentration of 20 ppmv or less hexane, minus methane and ethane	Indiana FESOP Permit Revision No.: 113-23204-00021
Williams Printing Company - East Point, GA	2005	Printing presses	Fountain solution: 5% VOC, blanket wash vapor pressure limit of 10mmHg or 2.5 lb VOC/gal; thermal oxidizer with 97% destruction efficiency	RBLC ID: GA-0111
Quad-Graphics - Sussex, WI	2005	Printing presses	Thermal oxidizer with 97.5% destruction efficiency, restrict vapor pressure of blanket washes to a maximum of 10 mmHg, and use of fountain solutions with no restricted alcohols	RBLC ID: WI-0222

Step Three: Rank Feasible Technologies

	Thermal Oxidation (Top BACT)
Destruction Efficiency	95 to 99%
Expected Emission Rates*	1,677.86 tons/year
Expected Emissions Reduction*	1,644.3 tons/year

* - Emission rates and reduction based on source's maximum uncontrolled emission rate of 1,709.68 tons per year for the two (2) proposed printing presses.

Step Four: Evaluate Top Control Alternatives

Thermal oxidation is the top control alternative to satisfy the BACT requirements of 326 IAC 8-1-6 (BACT), based on control efficiency and technical feasibility.

The source currently operates a thermal oxidizer to control VOC emissions from other processes onsite, and proposes that the VOC emissions from one (1) proposed press, identified as WM-403, be controlled by this existing control device. The one (1) proposed press, identified as WM-402, has an integrated dryer/oxidizer that will control the VOC emissions.

As the source has proposed to accept top BACT, the economic, environmental, and energy impacts to the source have not been evaluated.

Step Five: Select BACT

IDEM has determined that the best available control technology (BACT) to control VOC emissions from the two (2) proposed heatset web offset lithographic printing presses, identified as WM-402 and WM-403, shall be as follows:

- (a) The exhaust of Press WM-403 shall be vented to the Regenerative Thermal Oxidizer (RTO-1) with a minimum of 98% destruction efficiency for VOC;
- (b) The exhaust of Press WM-402 shall be vented to the one (1) integrated recuperative thermal oxidizer (IDO-1) with a minimum of 98% destruction efficiency for VOC, as demonstrated by achieving a VOC outlet concentration of 50 ppmv C_1 or less;
- (c) The VOC content of the fountain solution shall not exceed 3% VOC as applied;
- (d) The blanket and roller washes shall have a vapor pressure no greater than 10 mmHg at 20°C or the VOC content shall be limited to 2.5 lb/gal as applied; and
- (e) The capture and retention efficiencies used for reporting compliance shall be as follows and are based on U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994):
 - (1) 100% capture, by weight, of the VOC in press-ready inks;
 - (2) 70% capture, by weight, of the VOC in press-ready fountain solutions;
 - (3) 40% capture, by weight, of the VOC in press-ready automatic cleaning solvents;
 - (4) 20% retention, by weight, of VOC in inks in the paper substrate; and
 - (5) 50% retention, by weight, of manual cleaning solvents in the cleaning wipers. Cleaning wipers shall always be placed in closed containers after use.

Compliance with the above limits and conditions will satisfy the requirements of 326 IAC 8-1-6 (BACT).

**Appendix A: Emissions Calculations
VOC From Printing Press Operations**

Company Name: R.R. Donnelley & Sons Company
Address, City IN Zip: 2801 West Old Road 30, Warsaw, Indiana 46581-0837
Significant Source Modification No.: 085-28569-00009
Significant Permit Modification No.: 085-28593-00009
Reviewer: Stephanie Wilkerson
Date: 11/2/2009

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
WM-402	3000	57	1078531

	Maximum Coverage '(lbs/MMin ²)	Weight % Volatiles*	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Worst-case Ink	4.59	41%	80.00%	1078531	808.71
Fountain Solution	0.113	14%	100.00%	1078531	8.65
Automatic Wash Solution	0.035	30%	100.00%	1078531	5.66
Manual Wash Solution	0.059	100%	50.00%	1078531	15.91

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin ² /YEAR
WM-403	3000	57	1078531

INK VOCS					
Ink Name Press Id	Maximum Coverage '(lbs/MMin ²)	Weight % Volatiles*	Flash Off %	Throughput (MMin ² /Year)	Emissions (TONS/YEAR)
Worst-case Ink	4.59	41%	80.00%	1078531	808.71
Fountain Solution	0.113	14%	100.00%	1078531	8.65
Automatic Wash Solution	0.035	30%	100.00%	1078531	5.66
Manual Wash Solution	0.059	100%	50.00%	1078531	15.91

Total VOC Emissions =	1677.86 Ton/yr
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METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year
VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED INK FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

**Appendix A: Emissions Calculations
VOC From Printing Press Operations**

Company Name: R.R. Donnelley & Sons Company
Address, City IN Zip: 2801 West Old Road 30, Warsaw, Indiana 46581-0837
Significant Source Modification No.: 085-28569-00009
Significant Permit Modification No.: 085-28593-00009
Reviewer: Stephanie Wilkerson
Date: 11/2/2009

Controlled Emissions

	Uncontrolled VOC Emissions (tpy)	Destruction Efficiency (%)	Controlled VOC Emissions (tpy)
Press WM-402*	838.93	98%	16.78
Press WM-403	838.93	98%	16.78

METHODOLOGY

Controlled VOC Emissions (tpy) = Uncontrolled VOC Emissions (tpy) * (1 - Destruction Efficiency(%))

*Press WM-402 is equipped with an integrated dryer and oxidizer control system. The minimum VOC destruction efficiency of this control system shall be 98% as demonstrated by achieving an outlet concentration of 50 ppmv C₁ or less.

**Appendix A: Emissions Calculation:
HAPs**

Heatset web offset lithographic printers WM-402 & WM-403

Company Name: R.R. Donnelley & Sons Company
 Address, City IN Zip: 2801 West Old Road 30, Warsaw, Indiana 46581-0837
 Significant Source Modification No.: 085-28569-00009
 Significant Permit Modification No.: 085-28593-00009
 Reviewer: Stephanie Wilkerson
 Date: 11/2/2009

Uncontrolled PTE

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/MMir ²)	Maximum (MMir ² /hour)	Wt % (Butyl Carbitol)	Butyl Carbitol ** (tons /year)
Fountain Solution	8.97	14.20	0.00	14%	0.00	0.00	0.013	246.24	5.30%	1.22
Automatic Blanket wash	7.09	30.00	0.00	30%	0.00	0.00	0.005	246.24	0.00%	0.00
Manual Wash	7.34	100.00	0.00	100%	0.00	0.00	0.008	246.24	0.00%	0.00

Potential Emissions **Single press emissions = 1.22**
Total HAPs emissions = 2.43

**20 % (by weight) ink VOC retention in the substrate for heatset printing

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs



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: Debra Woodward
R.R> Donnelley & Sons Company
2801 West Old Road 30 POB 837
Warsaw, Indiana 46581

DATE: March 19, 2010

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

SUBJECT: Final Decision
Part 70
085-28593-00009

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:
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

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Governor

Thomas W. Easterly
Commissioner

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

March 19, 2010

TO: Warsaw Public Library

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

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

Applicant Name: R.R. Donnelley & Sons Company
Permit Number: 085-28593-00009

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	CDENNY 3/19/2010 R.R. Donnelley & Sons Company 085-28593-00009 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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											Remarks
1		Debora Woodward R.R. Donnelley & Sons Company, Warsaw Manufacturin 2801 W Old Road 30, PO Box 837 Warsaw IN 46581-0837 (Source CAATS)									
2		Joseph W Kingan VP - Mfg R.R. Donnelley & Sons Company, Warsaw Manufacturin 2801 W Old Road 30, PO Box 837 Warsaw IN 46581 (RO CAATS)									
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)									
4		Warsaw City Council and Mayors Office P.O. Box 817 Warsaw IN 46581 (Local Official)									
5		Warsaw Community Public Library 310 E Main St Warsaw IN 46580-2882 (Library)									
6		Kosciusko County Board of Commissioners 100 W. Center St, Room 220 Warsaw IN 46580 (Local Official)									
7		Mr. Joe Kingan R.R. Donnelley & Sons Company P O Box 837 Warsaw IN 46581 (Affected Party)									
8		Mr. Tim Thomas c/o Boilermakers Local 374 6333 Kennedy Ave. Hammond IN 46333 (Affected Party)									
9		Kosciusko County Health Department 100 W. Center Street, 3rd Floor Warsaw IN 46580-2877 (Health Department)									
10											
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