



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: Jan. 3, 2011

RE: Courier Kendallville, Inc. / 113-29548-00021

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

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

Ms. Christine Bitner
Courier Kendallville, Inc.
2500 Marion Dr
Kendallville, Indiana 46755

Jan. 3, 2011

Re: 113-29548-00021
First Significant Revision to
F113-20736-00021

Dear Ms. Bitner:

Courier Kendallville, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F113-20736-00021 on May 30, 2007 for a stationary commercial printing plant that manufacture adhesive bound and saddlewire bound books located at 2500 Marion Dr, Kendallville, Indiana 46755. On August 11, 2010, the Office of Air Quality (OAQ) received an application from the Source to revise the minimum operational temperature for the two Megtec Cleanswitch oxidizers, identified as Cleanswitch and Cleanswitch 2, from 1600° F to 1500° F and to install an additional heatset web offset lithographic printing press, identified as Lithoman 4. This printing press is subject to Best Available Control Technology (BACT) pursuant to 326 IAC 8-1-6. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Marcia Earl, of my staff, at 317-233-0863 or 1-800-451-6027, and ask for extension 3-0863.

Sincerely,



Alfred C. Dumauval, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised Permit
Technical Support Document
Calculations
Best Available Control Technology (BACT) Analysis

ACD/me

cc: File - Noble County
Noble County Health Department
IDEM Northern Regional Office
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section



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

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

**Courier Kendallville, Inc.
2500 Marion Drive
Kendallville, Indiana 46755**

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

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

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

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

Operation Permit No.: F 113-20736-00021	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: May 30, 2007 Expiration Date: May 30, 2017

First Administrative Amendment No. 113-25716-00021, issued January 18, 2008

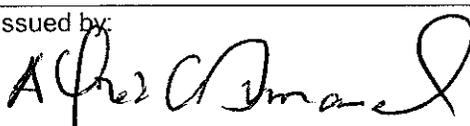
First Significant Permit Revision No. 113-29548-00021	
Issued by:  Alfred C. Dumaul, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Jan. 3, 2011 Expiration Date: May 30, 2017

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
SECTION B	GENERAL CONDITIONS	8
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Severability [326 IAC 2-8-4(4)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.9	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12	Emergency Provisions [326 IAC 2-8-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]	
B.20	Source Modification Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10] [IC 13-17-3-2]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	18
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.9	Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

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

Stratospheric Ozone Protection

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

SECTION D.1 FACILITY OPERATION CONDITIONS: Printing Presses..... 24

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

- D.1.1 Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Limitations [326 IAC 2-8-4] [326 IAC 2-2]
- D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
- D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]
- D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.7 VOC Emissions

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

- D.1.8 Thermal Oxidizer Temperature
- D.1.9 Parametric Monitoring

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

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

Certification 33
Emergency Occurrence Report 34
Quarterly Reports 36
Quarterly Deviation and Compliance Monitoring Report 40

Attachment A: Best Available Control Technology (BACT)

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a commercial printing plant that manufacturer's adhesive bound and saddlewire bound books

Source Address:	2500 Marion Dr, Kendallville, Indiana 46755
General Source Phone Number:	978 - 251 - 6256
SIC Code:	2752
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, installed after 1980, with a maximum line speed of 1,265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, exhausting to one (1) stack, identified as 6, each with a maximum heat input rate of 2.93 million British thermal units per hour.
- (b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, installed after 1980, with a maximum line speed of 1,600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, each with a maximum heat input rate of 4.4 million British thermal units per hour.
- (c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, installed after 1980, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, exhausting to one (1) stack, identified as 2, each with a maximum heat input rate of 2.56 million British thermal units per hour.
- (d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, installed after 1980, with a maximum line speed of 1,264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, each with a maximum heat input rate of 4.0 million British thermal units per hour.

- (e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, installed after 1980, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches.
- (f) One (1) sheetfed UV Coater, installed after 1980, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches.
- (g) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, installed in 2004, exhausting through stacks one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum heat input rate of 10.5 million British thermal units per hour.
- (h) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 2, installed in 2005, exhausting through stacks one (1) of two (2) Oxy 1 or Oxy 2, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 2 dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum heat input rate of 10.5 million British thermal units per hour.
- (i) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 3, installed in 2006, exhausting through stack TNV 1, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 3 dryer, exhausting to one (1) stack, identified as TNV 1, with a maximum heat input rate of 5.25 million British thermal units per hour.
- (j) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 4, approved for construction in 2010, exhausting through stack TNV 2, with a maximum line speed of 2,844 feet per minute and a maximum printing width of 56.5 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 4 dryer, exhausting to one (1) stack, identified as TNV 2, with a maximum heat input rate of 6.80 million British thermal units per hour.
- (k) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 2, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of 1,500°F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.
- (l) One (1) regenerative thermal oxidizer, identified as Cleanswitch 2, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 1, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of 1,500°F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.
- (m) One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 1, exhausting to one (1) stack, identified as TNV 1, with a maximum heat input rate of 5.25 million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 20 parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 3 printing press.

- (n) One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 2, exhausting to one (1) stack, identified as TNV 2, with a maximum heat input rate of 6.80 million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 10 parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 4 printing press.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour:
 - (1) Six (6) natural gas-fired space heaters, each with a maximum heat input rate of 0.20 million British thermal units per hour;
 - (2) Three (3) natural gas-fired air make-up units, two (2) with a maximum heat input rate of 0.18 million British thermal units per hour, each, and one (1) with a maximum heat input capacity of 0.15 million British thermal units per hour;
 - (3) One (1) natural gas fired space heater, with a maximum heat input capacity of 0.25 million British thermal units per hour;
 - (4) Nineteen (19) natural gas fired HVAC units, seventeen (17) with a maximum heat input rating of 0.400 million British thermal units per hour, each, one (1) with a maximum heat input rating of 0.350 million British thermal units per hour, and one (1) with a maximum heat input capacity of 0.125 million British thermal units per hour;
 - (5) One (1) natural gas fired space heater with a rating of 0.075 million British thermal units per hour.
- (b) The following VOC storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (c) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

- (g) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (i) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
 - (1) The cleaning solvent used on the UV coater;
 - (2) One (1) film cleaner used in the plating room;
- (j) Other activities or categories not previously identified:
 - (1) Five (5) binding operations, identified as Fox Stitcher, Norm Binder, Kolbus Binder, Corona, and Kolbus K-2, each with a maximum capacity of 560 pounds of paper waste per hour;
 - (2) Film processor used to develop black and white film; and
 - (3) Five (5) plate processors used to develop printing plates;
 - (4) Two (2) casemakers, identified as Kolbus DA-36;
 - (5) Two (2) tippers, identified as Hunkeler VEA; and
 - (6) Eight (8) electric plate processing ovens.

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

- (a) This permit, F113-20736-00021, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 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.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

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

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

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F113-20736-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (a) For performance testing required by this permit, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

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

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 16, installed after 1980, with a maximum line speed of 1,265 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 16 Upper Dryer and Hantscho Mark 16 Lower Dryer, exhausting to one (1) stack, identified as 6, each with a maximum heat input rate of 2.93 million British thermal units per hour.
- (b) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as M850, installed after 1980, with a maximum line speed of 1,600 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M850 Upper Dryer and Harris M850 Lower Dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, each with a maximum heat input rate of 4.4 million British thermal units per hour.
- (c) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Mark 6, installed after 1980, with a maximum line speed of 950 feet per minute and a maximum printing width of 35.5 inches. The press is equipped with two (2) natural gas-fired dryers, identified as Hantscho Mark 6 Upper Dryer and Hantscho Mark 6 Lower Dryer, exhausting to one (1) stack, identified as 2, each with a maximum heat input rate of 2.56 million British thermal units per hour.
- (d) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units and the addition of another four (4) printing units), identified as M130, installed after 1980, with a maximum line speed of 1,264 feet per minute and a maximum printing width of 37.5 inches, utilizing a regenerative thermal oxidizer for VOC control. The press is equipped with two (2) natural gas-fired dryers, identified as Harris M130 Upper Dryer and Harris M130 Lower Dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, each with a maximum heat input rate of 4.0 million British thermal units per hour.
- (e) One (1) nonheat set sheetfed offset printing press (consisting of four (4) printing units), identified as Heidelberg Sheetfed Press, installed after 1980, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches.
- (f) One (1) sheetfed UV Coater, installed after 1980, with a maximum line speed of 400 feet per minute and a maximum printing width of 39.5 inches.
- (g) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman, installed in 2004, exhausting through stacks one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum heat input rate of 10.5 million British thermal units per hour.
- (h) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 2, installed in 2005, exhausting through stacks one (1) of two (2) Oxy 1 or Oxy 2, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 2 dryer, exhausting to one (1) of two (2) stacks, identified as Oxy 1 or Oxy 2, with a maximum heat input rate of 10.5 million British thermal units per hour.

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

- (i) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 3, installed in 2006, exhausting through stack TNV 1, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 3 dryer, exhausting to one (1) stack, identified as TNV 1, with a maximum heat input rate of 5.25 million British thermal units per hour.
- (j) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 4, approved for construction in 2010, exhausting through stack TNV 2, with a maximum line speed of 2,844 feet per minute and a maximum printing width of 56.5 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 4 dryer, exhausting to one (1) stack, identified as TNV 2, with a maximum heat input rate of 6.80 million British thermal units per hour.
- (k) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 2, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of 1,500°F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.
- (l) One (1) regenerative thermal oxidizer, identified as Cleanswitch 2, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 1, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of 1,500°F and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.
- (m) One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 1, exhausting to one (1) stack, identified as TNV 1, with a maximum heat input rate of 5.25 million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 20 parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 3 printing press.
- (n) One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 2, exhausting to one (1) stack, identified as TNV 2, with a maximum heat input rate of 6.80 million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 10 parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 4 printing press.

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

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

D.1.1 Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Limitations [326 IAC 2-8-4] [326 IAC 2-2]

- (a) VOC emissions from the printing presses, identified as Lithoman 4, Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press, shall be limited to less than a total of ninety-two (92.0) tons per tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The VOC emissions calculated shall be the sum of each individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994 "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset

Lithographic Printing" (EPA September 1993) and the "Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing" (EPA-453/R-06-002), September 2006. The control efficiencies to be used for each thermal oxidizer shall be obtained from the most recent valid test. Compliance with this limit will be demonstrated by using the following equation:

Presses with a thermal oxidizer
$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Presses without a thermal oxidizer
$$E_n = U_n \times V_n \times F$$

Total VOC Emissions from all presses
$$E_t = E(\text{Lithoman 4}) + E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

n = Each printing press
t = Total printing presses
E_t = VOC emissions from all presses
E_n = VOC emissions from each press
U_n = Total usage of each material from each press
V_n = VOC content of each material from each press
F = Flash off factor of each material from each press
C_n = Capture efficiency for each thermal oxidizer from each press
D_n = Destruction efficiency for each oxidizer from each press (Oxidizer control efficiency)

- (b) The total HAP emissions from the heat set web offset lithographic printing presses, identified as Lithoman 4, Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press, shall be limited to a total of less than 8.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This total HAP limit of 8.7 tons per twelve (12) month consecutive period shall ensure that the worst case single HAP emissions are also less than ten (10) tons per year. The HAP emissions calculated shall be the sum of each individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994), "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993), "Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing" (EPA-453/R-06-002), September 2006. The control efficiencies to be used for each thermal oxidizer shall be obtained from the most recent valid test. Either the thermal oxidizer Cleanswitch or Cleanswitch 2 shall be operated at any one (1) time.

Compliance with this limit will be demonstrated by using the following equation:

Presses with thermal oxidizer
$$E_n = U_n \times H_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Presses without thermal oxidizer
$$E_n = U_n \times H_n \times F$$

Total HAP Emissions from all presses
$$E_t = E(\text{Lithoman 4}) + E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

- n = Each printing press
- t = Total printing presses
- Et = HAP emissions from all presses
- En = HAP emissions from all presses
- Un = Total usage of each material from all presses
- Hn = Worst Case single HAP content of each material for single HAP and Total HAP content of each material for total HAPs from all presses
- F = Flash off factor of each material from all presses
- Cn = Capture efficiency for each thermal oxidizer from each press
- Dn = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

Compliance with these limits, combined with the potential to emit VOC and HAP from all other emission units at this source, shall limit the source-wide total potential to emit VOC to less than 100 tons per 12 consecutive month period, and the source-wide total potential to emit HAPs to less than 10 tons per 12 consecutive month period for a single HAP and less than twenty-five (25) tons per 12 consecutive month period of total HAPs, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

- (a) Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) (Attachment A of the permit) for the printing press, identified as Lithoman, 4, has been determined to be the following:
- (1) The exhaust shall be vented to the one (1) integrated recuperative thermal oxidizer (TNV 2) with a minimum of 98% destruction efficiency for VOC as demonstrated by achieving a VOC outlet concentration of 10 ppmv or less as hexane, minus methane and ethane;
 - (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 2°C or the VOC content shall be limited to 70% or 5.6 lb/gal as applied; and
 - (4) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994), "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993), and "Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing" (EPA-453/R-06-002), September 2006:
 - (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; and
 - (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 326 IAC 8-1-6 and SPR 113-17840-00021, issued on January 6, 2004, the BACT for the printing presses, identified as Lithoman, M130, and M850 has been determined to be the use of one (1) of the regenerative thermal oxidizers, identified as Cleanswitch 2 or Cleanswitch, at all times the presses are in operation.
- (c) Pursuant to 326 IAC 8-1-6 and SPR 113-20307-00021, issued on May 27, 2005, the BACT for the one (1) heat set web offset lithographic printing press, identified as Lithoman 2, has been determined to be:
 - (1) The exhaust shall be vented to the one of the two (2) regenerative thermal oxidizers (Cleanswitch or Cleanswitch 2) with a minimum of 97% destruction efficiency for VOC;
 - (2) The VOC content of the fountain solution shall be no greater than three percent (3%) VOC as applied;
 - (3) The blanket and roller washes shall have a vapor pressure no greater than ten (10) mm Hg at 20°C or the VOC content shall be limited to two and one-half (2.5) pounds per gallon as applied; and
 - (4) The capture efficiencies used for reporting compliance shall be as follows and are based on the US EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994), and "Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing" (EPA-453/R-06-002), September 2006:
 - (4) The capture efficiencies used for reporting compliance shall be as follows and are based on the US EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994):
 - (A) 100 percent (100%) capture, by weight, of the VOC in press ready inks;
 - (B) 70 percent (70%) capture, by weight, of the VOC in press ready fountain solutions; and
 - (C) 40 percent (40%) capture, by weight, of the VOC in press ready automatic cleaning solvents.
- (d) Pursuant to 326 IAC 8-1-6 and SPR 113-23204-00021 issued on November 13, 2006, the BACT for the one (1) heat set web offset lithographic printing press, identified as Lithoman 3, has been determined to be:
 - (1) The exhaust shall be vented to the one (1) integrated recuperative thermal oxidizer, identified as TNV 1, with a minimum of ninety-eight percent (98%) destruction efficiency for VOC as demonstrated by achieving a VOC outlet concentration of twenty (20) ppmv or less as hexane, minus methane and ethane;
 - (2) The VOC content of the fountain solution shall be no greater than three percent (3%) VOC as applied;

- (3) The blanket and roller washes shall have a vapor pressure no greater than ten (10) mm Hg at 20°C or the VOC content shall be limited to two and one-half (2.5) pounds per gallon as applied; and
- (4) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 93), "Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing" (EPA-453/R-06-002), September 2006:
 - (A) 100 percent (100%) capture, by weight, of the VOC in press ready inks;
 - (B) 70 percent (70%) capture, by weight, of the VOC in press ready fountain solutions; and
 - (C) 40 percent (40%) capture, by weight, of the VOC in press ready automatic cleaning solvents.
- (e) The VOC emissions from the printing presses, identified as Mark 16 and Mark 6, shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with these limits shall render the requirements of 326 IAC 8-1-6 not applicable. D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

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

A Preventive Maintenance Plan is required for the printing presses and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.1.2(b) and (c), the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, utilizing methods as approved by the Commissioner. This test shall be performed by November 28, 2011 which is five (5) years from the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).
- (b) In order to demonstrate compliance with Condition D.1.2(b) and (c), the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch, utilizing methods as approved by the Commissioner. This test shall be performed by December 1, 2009, which is five (5) years from the date of the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).
- (c) In order to demonstrate compliance with Condition D.1.2(d), no later than one hundred eighty (180) days after initial startup, which is by June 1, 2007, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) integrated recuperative thermal oxidizer, identified as TNV 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. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).

- (d) In order to demonstrate compliance with Condition D.1.2(a), no later than one hundred eighty (180) days after initial startup of printing press Lithoman 4, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) integrated recuperative thermal oxidizer, identified as TNV 2, 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. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizers at all times the lithographic printing presses, identified as Lithoman 4, Lithoman 3, M130, M850, Lithoman and Lithoman 2 are in operation.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the ink, coating, fountain solution and cleaning solvent manufacturers. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall comply with the following:

- (a) At least one (1) regenerative thermal oxidizer, identified as Cleanswitch 2 or Cleanswitch, shall be in operation at all times when the printing presses M850, M130, Lithoman, and/or Lithoman 2 are in operation.
- (b) The integrated recuperative thermal oxidizer, identified as TNV 1, shall be in operation at all times when the printing press Lithoman 3 is in operation.
- (c) The integrated recuperative thermal oxidizer, identified as TNV 2, shall be in operations at all times when the printing press identified as Lithoman 4 is in operation.

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

D.1.8 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers, identified as Cleanswitch, Cleanswitch 2, TNV 1 and TNV 2, at or above the three (3) hour average temperatures of 1,500°F, 1,500°F, 1,400°F, and 1,400°F respectively.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.

D.1.9 Parametric Monitoring

- (a) The Permittee shall achieve a negative air flow pressure in the press dryers through either the following:
 - (1) A continuous monitor system with either an audible or visual alarm that sounds when a positive air flow is detected in the press dryer; or
 - (2) Interlocking the operation of the press dryer to the associated control device which will shut down the printing press when a positive air flow is detected in the press dryer.
- (b) 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.
- (c) The instruments used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months)

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

D.1.10 Record Keeping Requirements

- (a) In order to document the compliance status with Condition D.1.1 the Permittee shall maintain records of the materials used that contain any VOCs and/or HAPs. The records shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAPs emission limits established in Condition D.1.1. The records shall contain, as a minimum, the following information:
 - (1) The weight of VOC and HAP-containing material used and the weight percent VOC and HAP, including purchase orders and invoices necessary to verify the type and amount used; or
 - (2) The volume of VOC and HAP-containing material used and the weight of VOC and HAP per volume of VOC and HAP-containing material used.
 - (3) The weight of VOCs and HAPs emitted for each compliance period, considering capture and destruction (or removal) efficiency.
 - (4) Operational parameters of the VOC and HAP emission control equipment, considering capture and destruction (or removal) efficiency.
 - (5) Operational parameters of the VOC and HAP emission control equipment, such as:
 - (A) Data used to establish the capture and destruction (or removal) efficiencies at the time of the initial compliance test; and
 - (B) Temperature readings.

- (b) To document the compliance status with Condition D.1.2(e), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2(d).
 - (1) The amount and VOC content of each ink, fountain solution, coating material and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to inks and fountain solutions and those used as cleanup solvents. Alternatively, the ink, fountain solution or cleaning solvent with the highest VOC and HAP content may be used to represent all inks, fountain solutions or cleaning solvents used by the offset lithographic printing presses;
 - (2) A monthly log of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (c) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records indicating which approach in Condition D.1.9(a) is being used for each dryer to monitor negative air flow pressure in the dryers and when a positive air flow is detected.
- (d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2(e) shall be submitted using the reporting forms located at the end of this permit not later than thirty (30) days after the end of the quarter being reported. Sections C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
Permit No.: F 113-20736-00021

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
Permit No.: F 113-20736-00021

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance and Enforcement Branch**

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
Permit No.: F 113-20736-00021
Facility: One (1) heat set web offset lithographic printing press, identified as Mark 16
Parameter: VOC emissions
Limit: VOC emissions shall not exceed twenty-five (25) tons per year

YEAR: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance and Enforcement Branch**

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
Permit No.: F 113-20736-00021
Facility: One (1) heat set web offset lithographic printing press, identified as Mark 6
Parameter: VOC emissions
Limit: VOC emissions shall not exceed twenty-five (25) tons per year

YEAR: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 Compliance and Enforcement Branch**

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
 Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
 Permit No.: F 113-20736-00021
 Facilities: Nine (9) printing presses (Lithoman 4, Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press)
 Parameter: VOC Emissions
 Limit: Less than 92.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:
 Presses with a thermal oxidizer

$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$
 Presses without a thermal oxidizer

$$E_n = U_n \times V_n \times F$$
 Total VOC emissions from all presses

$$E_t = E(\text{Lithoman 4}) + E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

- n = Each printing press
- t = Total printing presses
- E_t = Total VOC emissions from all presses
- E_n = VOC emissions from each press
- U_n = Total usage of each material from each press
- V_n = VOC content of each material from each press
- F = Flash off factor of each material from each press
- C_n = Capture efficiency for each thermal oxidizer from each press
- D_n = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

YEAR: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 Compliance and Enforcement Branch**

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
 Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
 Permit No.: F 113-20736-00021
 Facilities: Nine (9) printing presses (Lithoman 4, Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press)
 Parameter: Total HAP Emissions
 Limit: Less than 8.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:
 Presses with a thermal oxidizer

$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$
 Presses without a thermal oxidizer

$$E_n = U_n \times V_n \times F$$
 Total VOC emissions from all presses

$$E_t = E(\text{Lithoman 4}) + E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

- n = Each printing press
- t = Total printing presses
- E_t = Total VOC emissions from all presses
- E_n = VOC emissions from each press
- U_n = Total usage of each material from each press
- V_n = VOC content of each material from each press
- F = Flash off factor of each material from each press
- C_n = Capture efficiency for each thermal oxidizer from each press
- D_n = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

YEAR: _____

Month	HAP Emissions (tons)	HAP Emissions (tons)	HAP Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance and Enforcement Branch**

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

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
Permit No.: F 113-20736-00021

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: _____

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

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

Source Background and Description

Source Name:	Courier Kendallville, Inc.
Source Location:	2500 Marion Drive, Kendallville, Indiana 46755
County:	Noble
SIC Code:	2752
Operation Permit No.:	F 113-20726-00021
Operation Permit Issuance Date:	May 30, 2007
Significant Permit Revision No.:	113-29548-00021
Permit Reviewer:	Marcia Earl

On November 30, 2010, the Office of Air Quality (OAQ) had a notice published in Kendallville News-Sun, Kendallville, Indiana, stating that Courier Kendallville, Inc. had applied for a significant permit revision to construct a head set web lithographic printing press with a natural gas-fired recuperative thermal oxidizer.

The notice also stated that the OAQ proposed to issue a significant permit revision for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On December 7, 2010, Courier Kendallville, Inc. submitted comments to IDEM, OAQ on the draft significant permit revision.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Courier requests the monitoring requirement for demonstrating continuous negative air pressure flow from the press dryers, Condition D.1.9 (b) and D.1.9 (d) be revised to allow for an alternate approach to demonstrate that negative air pressure flow from the dyers is being maintained to be consistent with EPA's CTG for Offset Lithographic and Letterpress Printing (EPA-453/R-06-002). Therefore, Condition D.1.9 needs to be revised as follows:

D.1.9 Parametric Monitoring

- (a) The Permittee shall achieve a negative air flow pressure in the press dryers through either of the following:
- (1) A continuous monitoring system with either an audible or visual alarm that sounds when a positive air flow is detected in the press dryer, or
 - (2) Interlocking the operation of the press dryer to the associated control device which will shut down the printing press when a positive air flow is detected in the

press dryer.

- (b) 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 solution;
 - (3) 40 percent (40%) capture, by weight, of the VOC in press ready automatic cleaning solvents.

Response to Comment 1:

IDEM agrees with this change. The permit has been revised as requested above:

D.1.9 Parametric Monitoring

- (a) The Permittee shall achieve a negative air flow pressure in the press dryers through either the following:
 - (1) A continuous monitor system with either an audible or visual alarm that sounds when a positive air flow is detected in the press dryer; or
 - (2) Interlocking the operation of the press dryer to the associated control device which will shut down the printing press when a positive air flow is detected in the press dryer.
- ~~(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.~~
- (eb) 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.

...

Comment 2:

As a result of the changes made to Condition D.1.9, please revise Condition D.1.10(c) to read as follows.

To document the compliance status with conditions D.1.1 and D.1.2, the Permittee shall maintain a record indicating which approach in Condition D.1.9(a) is being used for each dryer to monitor negative air flow pressure in the dryers and when a positive air flow is detected.

Response to Comment 2:

IDEM agrees with this change. The permit has been revised as requested above:

D.1.10 Record Keeping Requirements

...

- (c) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records **indicating which approach in Condition D.1.9(a) is being used for each dryer to monitor negative air flow pressure in the dryers and when a positive air flow is detected.** ~~of what process is used to maintain the negative air flow pressure in the dryers and when a positive air flow is detected as specified in Condition D.1.9.~~

...

Comment 3:

Courier Kendallville, Inc. request to revise the permit Condition D.1.2 (a)(1) from 10 parts per million as hexane, minus methane and ethane and replacing it with 20 parts per million. 10 parts per million is a dramatic increase in the required destruction efficiency of the existing control device. According to EPA's CTG for Offset Lithographic and Letterpress Printing (EPA-453/R-06-002), the 20 parts per million outlet concentration is an alternative to demonstrating destruction efficiency. Using this alternative is necessary with the built-in dryer and oxidizer as there is no traditional inlet to measure the concentration of VOC prior to it entering the oxidation zone. Changing the outlet concentration to something lower than 20 parts per million will in effect increase the required destruction efficiency, which was not included as part of the BACT analysis.

Response to Comment 3:

Pursuant to 326 IAC 8-1-6 (New facilities: general reduction requirements) a source constructed as of January 1, 1980, that has the potential emissions of twenty-five (25) tons or more per year located anywhere in the state and is no otherwise regulated by other provisions of this article shall reduce VOC emission using best available control technology (BACT). IDEM has determined the BACT for emission unit, Lithoman 4, shall be 10 ppmv or less as hexane, minus methane and ethane;

No changes were made as a result of this comment.

Comment 4:

Courier Kendallville, Inc. request that condition D.1.2(a)(3) be revised by changing the requirement for the VOC content limit of two and one-half (2.5) pounds per gallon to five and 6 tenths (5.6) pounds per gallon. When EPA released the final Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing in 2006 (EPA-453/R-06-002), they revised the 30% by weight VOC content limit (2.5pounds per gallon) to 70% by weight or 5.6 pounds per gallon.

Response to Comment 4:

IDEM agrees with this change. The permit has been revised as requested above:

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

...

- (3) The blanket and roller washes shall have a vapor pressure no greater than 10 mm Hg at 2°C or the VOC content shall be limited to ~~2.5 lb/gal~~ **70% or 5.6 lb/gal** as applied; and

...

Comment 5:

Courier Kendallville, Inc. request that in conditions D.1.1(a), D.1.1(b), D.1.2(a)(4), D.1.2(c)(4), and D.1.2(d)(4) to add the 2006 Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing (EPA-453/R-06-002) to the list of referenced EPA documents.

Response to Comment 5:

IDEM agrees with this change. The permit has been revised as requested above:

D.1.1 Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Limitations [326 IAC 2-8-4] [326 IAC 2-2]

- (a) VOC emissions from the printing presses, identified as Lithoman 4, Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press, shall be limited to less than a total of ninety-two (92.0) tons per tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The VOC emissions calculated shall be the sum of each individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994, and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993) **and the "Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing" (EPA-453/R-06-002), September 2006.** The control efficiencies to be used for each thermal oxidizer shall be obtained from the most recent valid test. Compliance with this limit will be demonstrated by using the following equation:
- (b) The total HAP emissions from the heat set web offset lithographic printing presses, identified as Lithoman 4, Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press, shall be limited to a total of less than 8.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This total HAP limit of 8.7 tons per twelve (12) month consecutive period shall ensure that the worst case single HAP emissions are also less than ten (10) tons per year. The HAP emissions calculated shall be the sum of each individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994), and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993), **"Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing" (EPA-453/R-06-002), September 2006.** The control efficiencies to be used for each thermal oxidizer shall be obtained from the most recent valid test. Either the thermal oxidizer Cleanswitch or Cleanswitch 2 shall be operated at any one (1) time.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

- (a) VOC emissions from the printing presses, identified as Lithoman 4, Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press, shall be limited to less than a total of ninety-two (92.0) tons per tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The VOC emissions calculated shall be the sum of each individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993). The control efficiencies to be used for each thermal oxidizer shall be obtained from the most recent valid test. Compliance with this limit will be demonstrated by using the following equation:

...

(4) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994), ~~and~~ "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993), **and "Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing" (EPA-453/R-06-002), September 2006:**

(c) Pursuant to 326 IAC 8-1-6 and SPR 113-20307-00021, issued on May 27, 2005, the BACT for the one (1) heat set web offset lithographic printing press, identified as Lithoman 2, has been determined to be:

...

(4) The capture efficiencies used for reporting compliance shall be as follows and are based on the US EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994), **and "Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing" (EPA-453/R-06-002), September 2006:**

(d) Pursuant to 326 IAC 8-1-6 and SPR 113-23204-00021 issued on November 13, 2006, the BACT for the one (1) heat set web offset lithographic printing press, identified as Lithoman 3, has been determined to be:

...

(4) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 93), **"Control Techniques Guideline for Offset Lithographic Printing and Letterpress Printing" (EPA-453/R-06-002), September 2006:**

...

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

(a) The unit description for the Lithoman 4 thermal oxidizer now shows the oxidizers outlet concentration to be 10 parts per million as hexane, minus methane and ethane to be consistent with the 326 IAC 8-1-6 BACT for this unit.

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

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

...

(n) One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 2, exhausting to one (1) stack, identified as TNV 2, with a maximum heat input rate of 6.80 million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of ~~20~~ **10** parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 4 printing press.

...

SECTION D.1

FACILITY OPERATION CONDITIONS

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

...

- (n) One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 2, exhausting to one (1) stack, identified as TNV 2, with a maximum heat input rate of 6.80 million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of ~~20~~**10** parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 4 printing press.

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

...

IDEM Contact

- (a) Questions regarding this proposed significant permit revision can be directed to Marcia Earl at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0863 or toll free at 1-800-451-6027 extension 3-0863.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

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

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

Source Description and Location

Source Name: Courier Kendallville, Inc.
Source Location: 2500 Marion Dr, Kendallville, Indiana 46755
County: Noble
SIC Code: 2752
Operation Permit No.: F113-20736-00021
Operation Permit Issuance Date: May 30, 2007
Significant Permit Revision No.: 113-29548-00021
Permit Reviewer: Marcia Earl

On August 11, 2010, the Office of Air Quality (OAQ) received an application from Courier Kendallville, Inc. related to a modification to an existing commercial printing plant that manufacturer's adhesive bound and saddlewire bound books.

Existing Approvals

The source was issued FESOP Renewal No.F113-20736-00021 on May 30, 2007. The source has since received the following approvals:

- (a) Administrative Amendment No. 113-25716-00021, issued on January 18, 2008; and

County Attainment Status

The source is located in Noble County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective 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**
 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. Noble 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}**
 Noble 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. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
 Noble 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.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

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

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Printing presses: Mark 6, Mark 16, M130, M850, Heidelberg Sheetfed, Lithoman, Lithoman 2, and Lithoman3	0.00	0.00	0.00	0.00	0.00	¹ <92.0	0.00	<23.7	Glycol Ethers <8.7
Natural Gas Combustion	0.63	2.51	2.51	0.198	33.10	1.82	27.80	0.70	Hexane 0.66
Binding	0.00	0.00	0.00	0.00	0.00	0.56	0.00	0.56	Vinyl Acetate 1.20
Other Insignificant Activities	³ 2.00	³ 2.00	³ 2.00	0.00	0.00	² 5.00	0.00	⁴ 0.00	0.00
Total PTE of Entire Source	2.63	4.51	4.51	0.198	33.10	<100	27.80	<25	<10.00
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

negl. = negligible

These emissions are based upon FESOP Renewal F113-20736-00021, issued May 30, 2007

¹ This limit has been adjusted to take into account VOC emissions from all insignificant activities.

² A conservative estimate of five (5) tons of VOC per year has been added to insignificant activities for non combustion emission units.

³ A conservative estimate of two (2) tons of PM, PM10 and PM2.5 per year has been added to insignificant activities for welding and cutting operations.

⁴ The HAP emissions, which are negligible for the insignificant welding operation, have been added to the insignificant activities.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the source previously accepted limits for VOC emissions from the printing presses (Mark 6, Mark 16, M130, M850, Heidelberg Sheetfed, Lithoman, Lithoman 2 and Lithoman 3) to less than 92.00 tons per year and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Courier Kendallville, Inc. on August 11, 2010, to:

- (1) revise the minimum temperature for the two Megtec Cleanswitch oxidizers from 1600° F to 1500° F because the destruction efficiency of VOC is still >99%; and
- (2) to install an additional heatset web offset lithographic printing press, identified as Lithoman 4.

The following is the new emission unit:

- (a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 4, approved for construction in 2010, exhausting through stack TNV 2, with a maximum line speed of 2,844 feet per minute and a maximum printing width of 56.5 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 4 dryer, exhausting to one (1) stack, identified as TNV 2, with a maximum heat input rate of 6.80 million British thermal units per hour.
- (b) One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 2, exhausting to one (1) stack, identified as TNV 2, with a maximum heat input rate of 6.80 million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 10 parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 4 printing press.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A, 1 through 13 of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Lithoman 4	0.00	0.00	0.00	0.00	0.00	812.33	0.00	13.59	Glycol Ethers 11.40
Total PTE of Proposed Revision	0.00	0.00	0.00	0.00	0.00	812.33	0.00	13.59	Glycol Ethers 11.40

negl. = negligible
 * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1)(E)(iv), because the revision involves the construction of one (1) heat set web offset lithographic printing press with potential to emit (PTE) greater than 25 tons per year. The source has agreed to maintain a FESOP status by limiting the source wide VOC emissions to less than 100 tons per year and the source wide HAPs to less than 10 tons per year of a single HAPs and less than 25 tons per year total HAPs (see PTE of the Entire Source After the Issuance of the FESOP Revision Section). In addition, this FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1)(C), because the revision involves a modification that is subject to 326 IAC 8-1-6 (see the State Rule Applicability Determination section below for the 326 IAC 8-1-6 applicability determination).

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Printing presses: Mark 6, Mark 16, M130, M850, Heidelberg Sheetfed, Lithoman, Lithoman 2, Lithoman3, Lithoman 4	0.00	0.00	0.00	0.00	0.00	¹ <92.0	0.00	<23.7	Glycol Ethers <8.7
Natural Gas Combustion	0.63 0.70	2.51 2.79	2.51 2.79	0.198 0.22	33.10 36.71	1.82 2.02	27.80 30.84	0.62 0.69	Hexane 0.60 0.65
Binding	0.00	0.00	0.00	0.00	0.00	0.56	0.00	0.56	Vinyl Acetate 1.20
Other Insignificant Activities	³ 2.00	³ 2.00	³ 2.00	0.00	0.00	² 5.00	0.00	⁴ 0.00	0.00

negl. = negligible

¹ This limit has been adjusted to take into account VOC emissions from all insignificant activities.

² A conservative estimate of five (5) tons of VOC per year has been added to insignificant activities for non combustion emission units.

³ A conservative estimate of two (2) tons of PM, PM10 and PM2.5 per year has been added to insignificant activities for welding and cutting operations.

⁴ The HAP emissions, which are negligible for the insignificant welding operation, have been added to the insignificant activities.

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The VOC emissions from the proposed heat set web offset lithographic printing press, identified as Lithoman 4, shall be included in the existing VOC limit which already limits the VOC emissions from the Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman and Heidelberg Sheetfed Press.

The VOC emissions from the above mentioned printing presses shall be limited to less than 92.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This ensures that VOC emissions from the entire source are less than one hundred (100) tons per year, including VOC emissions from all other emission units at the source. The VOC emissions calculated shall be the sum of each individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and "Control Techniques Guidelines for Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993). The control efficiencies to be used for the thermal oxidizers shall be obtained from the most recent valid test. The thermal oxidizers, Cleanswitch, Cleanswitch 2, TNV1 and TNV2 shall be operated at any one (1) time.

Compliance with this limit will be demonstrated by using the following equation:

Presses with a thermal oxidizer

$$E_n = U_n \times V_n \times F \times \{1 - (CN/100) \times (Dn/100)\}$$

Presses without a thermal oxidizer

$$E_n = U_n \times V_n \times F$$

Total VOC emissions from all presses

$$E_t = E(\text{Lithoman 4}) + E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

n = Each printing press

t = Total printing presses

E_t = Total VOC emissions from all presses

- En = VOC emissions from each press
- Un = Total usage of each material from each press
- Vn = VOC content of each material from each press
- F = Flash off factor of each material from each press
- Cn = Capture efficiency for each thermal oxidizer from each press
- Dn = Destruction efficiency for each thermal oxidizer from each press
(Oxidizer control efficiency)

- (2) The total HAP emissions from the heat set web offset lithographic printing presses, identified as Lithoman 4, Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheeffed Press, shall be limited to a total of less than 8.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This total HAP limit of 8.7 tons per twelve (12) month consecutive period shall ensure that the worst case single HAP emissions are also less than ten (10) tons per year. The HAP emissions calculated shall be the sum of each individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993). The control efficiencies to be used for each thermal oxidizer shall be obtained from the most recent valid test. Either the thermal oxidizer Cleanswitch or Cleanswitch 2 shall be operated at any one (1) time.

Compliance with this limit will be demonstrated by using the following equation:

Presses with a thermal oxidizer

$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Presses without a thermal oxidizer

$$E_n = U_n \times V_n \times F$$

Total HAP emissions from all presses

$$E_t = E(\text{Lithoman 4}) + E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

- n = Each printing press
- t = Total printing presses
- Et = Total HAP emissions from all presses
- En = HAP emissions from each press
- Un = Total usage of each material from each press
- Vn = HAP content of each material from each press
- F = Flash off factor of each material from each press
- Cn = Capture efficiency for each thermal oxidizer from each press
- Dn = Destruction efficiency for each thermal oxidizer from each press
(Oxidizer control efficiency)

- (b) PSD Minor Source

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be limited to less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

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

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be limited to less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

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

The unlimited potential to emit of HAPs from the (1) heat set web offset lithographic printing press, identified as Lithoman 4 is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from Lithoman 4 to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the proposed revision is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-8-4 (FESOP)

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will continue to be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

- (a) The unlimited VOC potential emissions from printing press Lithoman 4 is greater than twenty-five (25) tons per year. However, printing press Lithoman 4 shall be included in the existing VOC limit which already limits the VOC emission from the other printing presses (Lithoman 3, Lithoman 2, Lithoman, Mark 6, Mark16, M130, M850 and the Heidelberg Sheetfed Press). Therefore, the proposed revision is subject to the requirements of 326 IAC 8-1-6.
- (b) Printing press Lithoman 4 is subject to the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) because it has the potential of VOC emissions greater than twenty-five (25) tons per year. The Best Available Control Technology (BACT) (see Appendix A of this TSD) has been determined to be the following:
 - (1) The exhaust shall be vented to the one (1) integrated recuperative thermal oxidizer (TNV 2) with a minimum of 98% destruction efficiency for VOC as demonstrated by achieving a VOC outlet concentration of 10 ppmv or less as hexane, minus methane and ethane;
 - (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 2°C or the VOC content shall be limited to 2.5 lb/gal as applied; and
 - (4) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993):
 - (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; and
 - (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 326 IAC 8-1-6 and SPR 113-23204-00021 issued on November 13, 2006, the BACT for the one (1) heat set web offset lithographic printing press, identified as Lithoman 3, has been determined to be:
- (1) The exhaust shall be vented to the one (1) integrated recuperative thermal oxidizer (TNV 1) with a minimum of 98% destruction efficiency for VOC as demonstrated by achieving a VOC outlet concentration of 20 ppmv or less as hexane, minus methane and ethane;
 - (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 2°C or the VOC content shall be limited to 2.5 lb/gal as applied; and
 - (4) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993):
 - (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; and
 - (C) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.
- (c) Pursuant to 326 IAC 8-1-6 and SPR 113-20307-00021, issued on May 27, 2005, the BACT for the one (1) heat set web offset lithographic printing press, identified as Lithoman 2, has been determined to be:
- (A) The exhaust shall be vented to one of the two (2) regenerative thermal oxidizers (Cleanswitch or Cleanswitch 2) with a minimum of 97% destruction efficiency for VOC;
 - (B) The VOC content of the fountain solution shall be no greater than 3% VOC as applied;
 - (C) 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
 - (D) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994):
 - (1) 100 percent capture, by weight, of the VOC in press ready inks;
 - (2) 70 percent capture, by weight, of the VOC in press ready fountain solutions; and
 - (3) 40 percent capture, by weight, of the VOC in press ready automatic

cleaning solvents.

- (d) Pursuant to SPR 113-17840-00021326 issued on January 6, 2004, the BACT for the printing presses, identified as Lithoman, M130, and M850 has been determined to be the use of one (1) of the regenerative thermal oxidizers, identified as Cleanswitch 2 or Cleanswitch, at all times the presses are in operations.
- (e) The VOC emissions from the printing presses, identified as Mark 16 and Mark 6, shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with these limited shall render the requirements of 326 IAC 8-1-6 not applicable
- (f) The Heidelberg press has potential VOC emissions less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

Compliance Determination, Monitoring and Testing Requirements
--

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

The new thermal oxidizer, identified as TNV 2, has applicable compliance monitoring conditions as specified below:

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test result are available, the Permittee shall operate the thermal oxidizers, identified as Cleanswitch, Cleanswitch 2, TNV 1, and TNV 2, at or above the three (3) hour average temperatures of 1500°F, 1500°F, 1400°F and , 1400°F respectively.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with 326 IAC 2-8 and 326 IAC 8-1-6, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the (3) hour average temperature as observed during the compliant stack tests.
- (d) 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.
- (e) 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.
- (f) Maintaining a negative air flow pressure across the dryer inlets and outlets shall yield the following capture efficiencies:
 - (1) 100 percent capture, by weight, of the VOC in press ready inks;
 - (2) 70 percent capture, by weight, of the VOC in press ready fountain solutions; and
 - (3) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.

- (4) 20 percent retention, by weight, of VOC in inks in the paper substrate; and
- (5) 50 percent retention, by weight, of manual cleaning solvents in the cleaning wipers. Cleaning wipers shall always be placed in closed containers after use.

The thermal oxidizers, identified as Cleanswitch, Cleanswitch 2, TNV 1 and TNV 2, must operate properly to ensure compliance with 326 IAC 8-1-6 (New facilities; general reduction requirements) and 326 IAC 2-8 (FESOP).

Testing Requirements

- (a) The Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, utilizing methods as approved by the Commissioner. This test shall be performed by November 28, 2011 which is five (5) years from the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).
- (b) The Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOCC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch, utilizing methods as approved by the Commissioner. This test shall be performed by December 1, 2009, which if five (5) years from the date of the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).
- (c) Within one hundred eighty (180) days after initial startup, which is by June 1, 2007, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) integrated recuperative thermal oxidizer, identified as TNV 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. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).
- (d) Within one hundred eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) integrated recuperative thermal oxidizer, identified as TNV 2, 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. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: F113-23204-00021, issued on November 13, 2006.

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

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

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

...

- (i) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 3, installed in 2006, exhausting through stack TNV 1, with a maximum line speed of 2,211 feet per minute and a maximum printing width of 57.0 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 3 dryer, exhausting to one (1) stack, identified as TNV 1, with a maximum heat input rate

of ~~40.5~~ **5.25** million British thermal units per hour.

- (j) **One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 4, approved for construction in 2010, exhausting through stack TNV 2, with a maximum line speed of 2,844 feet per minute and a maximum printing width of 56.5 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 4 dryer, exhausting to one (1) stack, identified as TNV 2, with a maximum heat input rate of 6.80 million British thermal units per hour.**
- (kj) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 2, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of ~~4,600°F~~ **1,500°F** and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.
- (lk) One (1) regenerative thermal oxidizer, identified as Cleanswitch 2, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 1, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of ~~4,600°F~~ **1,500°F** and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.
- (ml) One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 1, exhausting to one (1) stack, identified as TNV 1, with a maximum heat input rate of ~~5.34~~ **5.25** million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 20 parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 3 printing press.
- (n) **One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 2, exhausting to one (1) stack, identified as TNV 2, with a maximum heat input rate of 6.80 million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 10 parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 4 printing press.**

...

SECTION D.1

FACILITY OPERATION CONDITIONS

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

...

- (j) **One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 4, approved for construction in 2010, exhausting through stack TNV 2, with a maximum line speed of 2,844 feet per minute and a maximum printing width of 56.5 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 4 dryer, exhausting to one (1) stack, identified as TNV 2, with a maximum heat input rate of 6.80 million British thermal units per hour.**
- (kj) One (1) regenerative thermal oxidizer, identified as Cleanswitch, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 2, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of ~~4,600°F~~ **1,500°F** and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.

- (lk) One (1) regenerative thermal oxidizer, identified as Cleanswitch 2, using natural gas as a supplementary fuel, exhausting to one (1) stack, identified as Oxy 1, with a maximum heat input rate of 0.81 million British thermal units per hour. The oxidizer has a minimum temperature of ~~1,600°F~~ **1,500°F** and is used to control VOC emissions from units M130, M850, Lithoman and Lithoman 2.
- (ml) One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 1, exhausting to one (1) stack, identified as TNV 1, with a maximum heat input rate of 5.25 million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 20 parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 3 printing press.
- (n) **One (1) natural gas fired integrated recuperative thermal oxidizer, identified as TNV 2, exhausting to one (1) stack, identified as TNV 2, with a maximum heat input rate of 5.25 million British thermal units per hour. The oxidizer has a minimum temperature of 1,400°F, shall have an outlet concentration of 10 parts per million as hexane, minus methane and ethane, and is used to control VOC emissions from the Lithoman 4 printing press.**

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

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

D.1.1 ~~FESOP Limits [326 IAC 2-8-4]~~ Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Limitations [326 IAC 2-8-4] [326 IAC 2-2]

- (a) VOC emissions from the printing presses, identified as **Lithoman 4**, Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press, shall be limited to less than a total of ninety-two (92.0) tons per tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The VOC emissions calculated shall be the sum of each individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993). The control efficiencies to be used for each thermal oxidizer shall be obtained from the most recent valid test. Compliance with this limit will be demonstrated by using the following equation:

Presses with a thermal oxidizer
$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Presses without a thermal oxidizer
$$E_n = U_n \times V_n \times F$$

Total VOC Emissions from all presses
$$E_t = \mathbf{E(Lithoman 4)} + E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

...

- (b) ~~The combination of HAP emissions from the heat set web offset lithographic printing presses, identified as Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press, shall be limited to a total of less than 8.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This combination HAP limit shall ensure the worst case single HAP emissions are less than ten (10) tons per year. The HAP emissions calculated shall be the sum of each~~

individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 94) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 93). The control efficiencies to be used for each thermal oxidizer shall be obtained from the most recent valid test. Either the thermal oxidizer Cleanswitch, Cleanswitch 2, TNV 1, shall be operated at any one (1) time. Compliance with this limit shall be demonstrated by using the following equation:

The total HAP emissions from the heat set web offset lithographic printing presses, identified as Lithoman 4, Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press, shall be limited to a total of less than 8.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This total HAP limit of 8.7 tons per twelve (12) month consecutive period shall ensure that the worst case single HAP emissions are also less than ten (10) tons per year. The HAP emissions calculated shall be the sum of each individual printing press. The flash off factors to be used shall be obtained from the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993). The control efficiencies to be used for each thermal oxidizer shall be obtained from the most recent valid test. Either the thermal oxidizer Cleanswitch or Cleanswitch 2 shall be operated at any one (1) time.

Compliance with this limit will be demonstrated by using the following equation:

Presses with thermal oxidizer
$$E_n = U_n \times H_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Presses without thermal oxidizer
$$E_n = U_n \times H_n \times F$$

Total HAP Emissions from all presses
$$E_t = E(\text{Lithoman 4}) + E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

...

Compliance with these limits, combined with the potential to emit VOC and HAP from all other emission units at this source, shall limit the source-wide total potential to emit VOC to less than 100 tons per 12 consecutive month period, and the source-wide total potential to emit HAPs to less than 10 tons per 12 consecutive month period for a single HAP and less than and twenty-five (25) tons per 12 consecutive month period of total HAPs, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

- (a) Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the printing press, identified as Lithoman, 4, has been determined to be the following:
- (1) **The exhaust shall be vented to the one (1) integrated recuperative thermal oxidizer (TNV 2) with a minimum of 98% destruction efficiency for VOC as demonstrated by achieving a VOC outlet concentration of 10 ppmv or less as hexane, minus methane and ethane;**

- (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 2°C or the VOC content shall be limited to 2.5 lb/gal as applied; and**
 - (4) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993):**
 - (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; and**
 - (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.**
- (ab)** Pursuant to 326 IAC 8-1-6 and SPR 113-17840-00021, issued on January 6, 2004, the BACT for the printing presses, identified as Lithoman, M130, and M850 has been determined to be the use of one (1) of the regenerative thermal oxidizers, identified as Cleanswitch 2 or Cleanswitch, at all times the presses are in operation.
- (bc)** Pursuant to 326 IAC 8-1-6 and SPR 113-20307-00021, issued on May 27, 2005, the BACT for the one (1) heat set web offset lithographic printing press, identified as Lithoman 2, has been determined to be:
...
- (4) The capture efficiencies used for reporting compliance shall be as follows and are based on the US EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994):**
...
- (ed)** Pursuant to 326 IAC 8-1-6 and SPR 113-23204-00021 issued on November 13, 2006, the BACT for the one (1) heat set web offset lithographic printing press, identified as Lithoman 3, has been determined to be:
...
- (4) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and "Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993):**

...

- (de) The VOC emissions from the printing presses, identified as Mark 16 and Mark 6, shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with these limits shall render the requirements of 326 IAC 8-1-6 not applicable.

...

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) **In order to demonstrate compliance with Condition D.1.2(b) and (c),** The Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch 2, utilizing methods as approved by the Commissioner. This test shall be performed by November 28, 2011 which is five (5) years from the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).
- (b) **In order to demonstrate compliance with Condition D.1.2(b) and (c),** The Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) regenerative thermal oxidizer, identified as Cleanswitch, utilizing methods as approved by the Commissioner. This test shall be performed by December 1, 2009, which is five (5) years from the date of the most recent valid compliance demonstration. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).
- (c) **In order to demonstrate compliance with Condition D.1.2(d),** ~~Within~~ **no later than** one hundred eighty (180) days after initial startup, which is by June 1, 2007, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) integrated recuperative thermal oxidizer, identified as TNV 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. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).
- (d) **In order to demonstrate compliance with Condition D.1.2(a), no later than one hundred eighty (180) days after initial startup of printing press Lithoman 4, the Permittee shall conduct a performance test to verify the VOC destruction efficiency and overall VOC control efficiency for the one (1) integrated recuperative thermal oxidizer, identified as TNV 2, 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. This test is being required to demonstrate compliance with 326 IAC 2-8-4 (FESOP).**

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizers at all times the lithographic printing presses, identified as **Lithoman 4**, Lithoman 3, M130, M850, Lithoman and Lithoman 2 are in operation.

...

D.1.7 VOC Emissions

In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall comply with the following:

...

- (c) **The integrated recuperative thermal oxidizer, identified as TNV 2, shall be in operations at all times when the printing press identified as Lithoman 4 is in operation.**

D.1.8 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on each of the thermal oxidizers for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers, identified as Cleanswitch, Cleanswitch 2, ~~and TNV 1,~~ **and TNV 2** at or above the three (3) hour average temperatures of ~~1,600°F~~ **1,500°F**, ~~1,600°F~~ **1,500°F**, and ~~1,400°F~~ **and 1,400°F**, respectively.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.

D.1.9 Parametric Monitoring

~~(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.~~

- (a) **The Permittee shall achieve a negative air flow pressure in the press dryers through either the following:**
- (1) **A continuous monitor system with either an audible or visual alarm that sounds when a positive air flow is detected in the press dryer; or**
 - (2) **Interlocking the operation of the press dryer to the associated control device which will shut down the printing press when a positive air flow is detected in the press dryer.**
- (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.

...

- (b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

Change 1

Several of IDEM's branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to "Permit Administration and Development Section" and the "Permits Branch" have been changed to "Permit Administration and Support Section". References to "Asbestos Section", "Compliance Data Section", "Air Compliance Section", and "Compliance Branch" have been changed to "Compliance and Enforcement Branch". The permit has been revised as follows:

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

Change No. 2

For clarity, IDEM has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to "Section C... contains the Permittee's obligations with regard to the records required by this condition."

Change No. 3

For clarity, IDEM has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to "Section C... contains the Permittee's obligations with regard to the records required by this condition."

Change No. 4

IDEM has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timelines have been switched to "no later than" or "not later than" except for the timelines in Section B - Revocation of Permits, Duty to Provide Information, Preventive Maintenance Plan, Emergency Provisions, Operational Flexibility, Section C - General Record Keeping Requirements and the Emergency Occurrence Report. The underlying rules state "within."

Change No. 5

IDEM has decided to clarify what rule requirements a certification needs to meet. IDEM has decided to remove the last sentence dealing with the need for certification from the form because the Conditions requiring the forms already address this issue.

Change No. 6

To clarify that Section B - Certification only states what a certification must be, IDEM has revised this condition.

Change No. 7

IDEM has decided to clarify Section B - Preventive Maintenance Plan.

Change No. 8

IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-8-4(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.

Change No. 9

IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM has removed Section B - Deviation from Permit Requirements and Conditions and added the requirements of that condition to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM already states the timeline and certification needs of each report in the condition requiring the report.

Change No. 10

IDEM has decided to state which rule establishes the authority to set a deadline for the Permittee

to submit additional information. Therefore, Section B - Permit Renewal has been revised.

Change No. 11

IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.

Change No. 12

IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.

Change No. 13

IDEM has changed the title, order, and wording of the condition formerly entitled Section C - Fugitive Dust Emissions to match 326 IAC 6.8-10-3.

Change No. 14

IDEM has removed the first paragraph of Section C - Performance Testing as due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.

Change No. 15

IDEM has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition.

Change No. 16

IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.

Change No. 17

IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

Change No. 18

IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.

Change No. 19

The voice of paragraph (b) of Section C - General Record Keeping Requirements has been change to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

Change No. 20

IDEM has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.

Change No. 21

IDEM has decided to clarify Section D - Testing Requirements.

Change No. 22

IDEM has included the replacement of an instrument as an acceptable action in Section D - Parametric Monitoring.

Change No. 23

The word "status" has been added to Section D - Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.

Change No. 24

The phrase "of this permit" has been added to paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.

Change No. 25

IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.

...

~~SECTION B~~ ~~GENERAL CONDITIONS~~

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

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

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

~~(a) This permit, 113-20736-00021, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.~~

~~(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, 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 2-8-6]~~

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

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

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

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

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

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

~~(a) — The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.~~

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

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

~~(a) — Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~

~~(b) — One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.~~

~~(c) — an "authorized individual" is defined at 326 IAC 2-1.1-1(1).~~

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

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

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~(b) — The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by~~

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

~~(c) The annual compliance certification report shall include the following:~~

- ~~(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;~~
- ~~(2) The compliance status;~~
- ~~(3) Whether compliance was continuous or intermittent;~~
- ~~(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and~~
- ~~(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.~~

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

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

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

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

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

- ~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~
- ~~(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and~~
- ~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~

~~If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the~~

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

- (c) ~~To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.~~

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

- (a) ~~An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.~~

- (b) ~~An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:~~

- (1) ~~An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;~~

- (2) ~~The permitted facility was at the time being properly operated;~~

- (3) ~~During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;~~

- (4) ~~For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 Section), or~~

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

~~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 Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

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

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

- (A) ~~A description of the emergency;~~

- (B) ~~Any steps taken to mitigate the emissions; and~~

~~(C) — Corrective actions taken.~~

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

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

~~(c) — In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.~~

~~(d) — This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.~~

~~(e) — The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.~~

~~(f) — Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.~~

~~(g) — Operations may continue during an emergency only if the following conditions are met:~~

~~(1) — If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

~~(2) — If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) — The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

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

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

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

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

~~(a) — All terms and conditions of permits established prior to 113-20736-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either:~~

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

~~(2) — revised, or~~

~~(3) — deleted.~~

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

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

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

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

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

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

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

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

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

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

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

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

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

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

~~(3) — That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]~~

~~(c) — Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]~~

~~(d) — The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30)~~

~~days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(e)]~~

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

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

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

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

- ~~(b) A timely renewal application is one that is:~~

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

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

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

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

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

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

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

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

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

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

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

~~(1) — The changes are not modifications under any provision of Title I of the Clean Air Act;~~

~~(2) — Any approval required by 326 IAC 2-8-11.1 has been obtained;~~

~~(3) — The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);~~

~~(4) — The Permittee notifies the:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~and~~

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

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

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

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

~~(b) — Emission Trades [326 IAC 2-8-15(c)]~~

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

~~(c) — Alternative Operating Scenarios [326 IAC 2-8-15(d)]~~

~~— The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.~~

~~(d) — Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.~~

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

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

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

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

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

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

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

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

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

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

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

- ~~(a) — The Permittee shall pay annual fees to IDEM, OAQ. 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.24 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]~~

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

~~SECTION C SOURCE OPERATION CONDITIONS~~

~~Entire Source~~

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

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

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

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

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

- ~~(a) Pursuant to 326 IAC 2-8:~~

~~(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.~~

~~(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and~~

~~(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.~~

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

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

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

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

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

permit:

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management

Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254

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

~~(e) — Procedures for Asbestos Emission Control~~

~~The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(e). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

~~(f) — Demolition and Renovation~~

~~The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).~~

~~(g) — Indiana Accredited Asbestos Inspector~~

~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.~~

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

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

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

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

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

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

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

~~(c) — Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.~~

~~Compliance Requirements [326 IAC 2-1.1-11]~~

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

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

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

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

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

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

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

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

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

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

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

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

~~(a) — When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.~~

~~(b) — The Permittee may request that the IDEM, OAQ, approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.~~

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

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

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

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

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

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

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

compliant stack tests.

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

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

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

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

-
- (a) This permit, F113-20736-00021, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
 - (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 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.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December

31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.**

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit

condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F113-20736-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

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

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

- (1) **The changes are not modifications under any provision of Title I of the Clean Air Act;**
- (2) **Any approval required by 326 IAC 2-8-11.1 has been obtained;**
- (3) **The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);**
- (4) **The Permittee notifies the:**

**Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251**

and

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

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

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

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

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

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.**

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (a) For performance testing required by this permit, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

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

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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) **Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.**

Stratospheric Ozone Protection

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

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

...

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

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for the printing presses and their control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

...

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the ink, coating, fountain solution and cleaning solvent manufacturers. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

...

D.1.9 Parametric Monitoring

...

- (d) **The instruments used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months)**

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

D.1.10 Record Keeping Requirements

- (a) **In order to document the compliance status with Condition D.1.1** ~~t~~**The Permittee shall maintain records of the materials used that contain any VOCs and/or HAPs. The records shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAPs emission limits established in Condition D.1.1. The records shall contain, as a minimum, the following information:**

...

- (b) To document **the** compliance **status** with Condition D.1.2(~~de~~), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2(d).
...
- (c) To document **the** compliance **status** with Conditions D.1.1 and D.1.2, the Permittee shall maintain records of the differential pressure across the dryer inlets and outlets as specified in Condition D.1.9.
- (d) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~ **contains the Permittee's obligations with regard to the records required by this condition.**

D.1.11 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.1.1 and D.1.2(~~de~~) 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 not later than** thirty (30) days after the end of the quarter being reported. **Sections C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.** The report submitted by the Permittee does ~~not~~ require a the certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
...

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
Mailing Address: ~~2500 Marion Drive, Kendallville, Indiana 46755~~
Permit No.: F 113-20736-00021
...

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

Compliance and Enforcement Branch
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
Mailing Address: ~~2500 Marion Drive, Kendallville, Indiana 46755~~

Permit No.: F 113-20736-00021

...

~~A certification is not required for this report.~~

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
~~COMPLIANCE DATA SECTION~~
Compliance and Enforcement Branch

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
~~Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755~~
Permit No.: F 113-20736-00021
Facility: One (1) heat set web offset lithographic printing press, identified as Mark 16
Parameter: VOC emissions
Limit: VOC emissions shall not exceed twenty-five (25) tons per year

...

No deviation occurred in this ~~month~~ **quarter**.

Deviation/s occurred in this ~~month~~ **quarter**.

...

~~Attach a signed certification to complete this report.~~

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
~~COMPLIANCE DATA SECTION~~
Compliance and Enforcement Branch

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
~~Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755~~
Permit No.: F 113-20736-00021
Facility: One (1) heat set web offset lithographic printing press, identified as Mark 6
Parameter: VOC emissions
Limit: VOC emissions shall not exceed twenty-five (25) tons per year

...

No deviation occurred in this ~~month~~ **quarter**.

Deviation/s occurred in this ~~month~~ **quarter**.

...

~~Attach a signed certification to complete this report.~~

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
~~COMPLIANCE DATA SECTION~~
Compliance and Enforcement Branch

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
Mailing Address: ~~2500 Marion Drive, Kendallville, Indiana 46755~~
Permit No.: F 113-20736-00021
Facilities: ~~Eight (8)~~ **Nine (9)** printing presses (**Lithoman 4**, Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press)
Parameter: VOC Emissions
Limit: **Less than** 92.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:
Presses with a thermal oxidizer
$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Presses without a thermal oxidizer
$$E_n = U_n \times V_n \times F$$

Total VOC emissions from all presses
$$E_t = \mathbf{E(Lithoman 4)} + E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

n = Each printing press
t = Total printing presses
E_t = Total VOC emissions from all presses
E_n = VOC emissions from each press
U_n = Total usage of each material from each press
V_n = VOC content of each material from each press
F = Flash off factor of each material from each press
C_n = Capture efficiency for each thermal oxidizer from each press
D_n = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

...
 No deviation occurred in this ~~month~~ **quarter**.
 Deviation/s occurred in this ~~month~~ **quarter**.

...

~~Attach a signed certification to complete this report.~~

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
~~COMPLIANCE DATA SECTION~~
Compliance and Enforcement Branch

FESOP Quarterly Report

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
Mailing Address: ~~2500 Marion Drive, Kendallville, Indiana 46755~~
Permit No.: F 113-20736-00021
Facilities: ~~Eight (8)~~ **Nine (9)** printing presses (**Lithoman 4**, Lithoman 3, Mark 6, Mark 16, M130, M850, Lithoman 2, Lithoman, and Heidelberg Sheetfed Press)
Parameter: Total HAP Emissions
Limit: **Less than** 8.7 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance shall be shown using the following equation:
Presses with a thermal oxidizer
$$E_n = U_n \times V_n \times F \times \{1 - (C_n/100) \times (D_n/100)\}$$

Presses without a thermal oxidizer
$$E_n = U_n \times V_n \times F$$

Total VOC emissions from all presses
$$E_t = \mathbf{E(Lithoman 4)} + E(\text{Lithoman 3}) + E(\text{Mark 6}) + E(\text{Mark 16}) + E(\text{M130}) + E(\text{M850}) + E(\text{Lithoman 2}) + E(\text{Lithoman}) + E(\text{Heidelberg})$$

Where:

n = Each printing press
t = Total printing presses

- Et = Total VOC emissions from all presses
- En = VOC emissions from each press
- Un = Total usage of each material from each press
- Vn = VOC content of each material from each press
- F = Flash off factor of each material from each press
- Cn = Capture efficiency for each thermal oxidizer from each press
- Dn = Destruction efficiency for each thermal oxidizer from each press (Oxidizer control efficiency)

YEAR: _____

...

- No deviation occurred in this ~~month~~ **quarter**.
- Deviation/s occurred in this ~~month~~ **quarter**.

...

~~Attach a signed certification to complete this report.~~

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
Compliance and Enforcement Branch**

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

Source Name: Courier Kendallville, Inc.
Source Address: 2500 Marion Dr, Kendallville, Indiana 46755
~~Mailing Address: 2500 Marion Drive, Kendallville, Indiana 46755~~
Permit No.: F 113-20736-00021

...

~~A certification is not required for this report.~~

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on August 11, 2010.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 113-29548-00021. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Marcia Earl at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0863 or toll free at 1-800-451-6027 extension 3-0863.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

Company Name: Courier Kendallville, Inc.
 Address City IN Zip: 2500 Marion Dr, Kendallville, Indiana 46755
 Permit No: F113-29548-00021
 Reviewer: Marcia Earl
 Date: August 2010

Uncontrolled Emissions

Emission Units	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NOx	HAPs	Worst Case HAPs
Lithoman 3	0.00	0.00	0.00	0.00	631.43	0.00	0.00	11.94	Glycol Ethers 8.86
Lithoman 2	0.00	0.00	0.00	0.00	631.43	0.00	0.00	11.94	Glycol Ethers 8.86
Lithoman	0.00	0.00	0.00	0.00	631.53	0.00	0.00	11.94	Glycol Ethers 8.86
Lithoman 4	0.00	0.00	0.00	0.00	812.33	0.00	0.00	13.59	Glycol Ethers 11.40
Mark 16	0.00	0.00	0.00	0.00	85.03	0.00	0.00	0.99	Glycol Ethers 0.99
M850	0.00	0.00	0.00	0.00	195.00	0.00	0.00	2.65	Glycol Ethers 2.65
M130	0.00	0.00	0.00	0.00	203.94	0.00	0.00	1.05	Glycol Ethers 1.05
Mark 6	0.00	0.00	0.00	0.00	30.84	0.00	0.00	0.74	Glycol Ethers 0.74
Heidelberg Sheetfed	0.00	0.00	0.00	0.00	3.72	0.00	0.00	1.02	Xylene 2.53
Natural Gas Combustion	0.70	2.79	2.79	0.22	2.02	30.84	36.71	0.69	Hexane 0.65
Binding	0.00	0.00	0.00	0.00	0.56	0.00	0.00	0.56	Vinyl Acetate 1.20
Other Insignificant Activities	2.00	2.00	2.00	0.00	5.00	0.00	0.00	0.00	0.00
Total	2.70	4.79	4.79	0.22	2601.40	30.84	36.71	59.24	Glycol Ethers 43.41

Limited/Controlled Emissions

Emission Units	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NOx	HAPs	Worst Case HAPs
Lithoman 3	0.00	0.00	0.00	0.00	¹ Limited to less than 92.0 tons per year	0.00	0.00	Total HAPs limited to less than 23.70 tons per year	Single HAP limited less than 8.70 tons per year
Lithoman 2	0.00	0.00	0.00	0.00		0.00	0.00		
Lithoman	0.00	0.00	0.00	0.00		0.00	0.00		
Lithoman 4	0.00	0.00	0.00	0.00		0.00	0.00		
Mark 16	0.00	0.00	0.00	0.00		0.00	0.00		
M850	0.00	0.00	0.00	0.00		0.00	0.00		
M130	0.00	0.00	0.00	0.00		0.00	0.00		
Mark 6	0.00	0.00	0.00	0.00		0.00	0.00		
Heidelberg Sheetfed	0.00	0.00	0.00	0.00		0.00	0.00		
Natural Gas Combustion	0.70	2.79	2.79	0.22	2.02	30.84	36.71	0.69	Hexane 0.65
Binding	0.00	0.00	0.00	0.00	0.56	0.00	0.00	0.56	Vinyl Acetate 0.56
Other Insignificant Activities	2.00	2.00	2.00	0.00	5.00	0.00	0.00	0.00	0.00
Total	2.70	4.79	4.79	0.22	<100.00	30.84	36.71	<25.00	Glycol Ethers <10.00

¹ This limit has been adjusted to take into account VOC emissions from all insignificant activities.

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

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Dr, Kendallville, Indiana 46755
Permit Number: F113-29548-00021
Reviewer: Marcia Earl
Date: August 2010

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (feet/min)	MAXIMUM PRINT WIDTH (inches)	MMin ² /year
Lithoman 3	2211	56.50	787905

INK VOCS					
Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /year)	Emissions (tons/year)
Ink-Process Black	4	34.56%	80.00%	787905	435.68
Ink-Process Blue	4	39.62%	80.00%	787905	499.47
Ink-Process Red	4	40.54%	80.00%	787905	511.07
Ink-Process Yellow	4	43.85%	80.00%	787905	552.79
Fountain Solution (Emerald AMVP)	0.15	87.40%	100.00%	787905	51.65
Cleaning Solvent (A-60 Odorless)	0.14	96.80%	50.00%	787905	26.69
Cleaning Solvent (LPC)	0.14	92.40%	50.00%	787905	25.71
Misc	0.001	75.00%	100.00%	787905	0.30

Total VOC Emissions =	631.43	ton/year
-----------------------	---------------	-----------------

METHODOLOGY

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.

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 FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

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: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Dr, Kendallville, Indiana 46755
Permit Number: F113-29548-00021
Reviewer: Marcia Earl
Date: August 2010

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (feet/min)	MAXIMUM PRINT WIDTH (inches)	MMin ² /year
Lithoman 2	2211	56.50	787905

INK VOCS					
Ink Name	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /year)	Emissions (tons/year)
Ink-Process Black	4	34.56%	80.00%	787905	435.68
Ink-Process Blue	4	39.62%	80.00%	787905	499.47
Ink-Process Red	4	40.54%	80.00%	787905	511.07
Ink-Process Yellow	4	43.85%	80.00%	787905	552.79
Fountain Solution (Emerald AMVP)	0.15	87.40%	100.00%	787905	51.65
Cleaning Solvent (A-60 Odorless)	0.14	96.80%	50.00%	787905	26.69
Cleaning Solvent (LPC)	0.14	92.40%	50.00%	787905	25.48
Misc	0.001	75.00%	100.00%	787905	0.30

Total VOC Emissions =	631.43	tons/year
-----------------------	---------------	------------------

METHODOLOGY

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

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: Courier Kendallville, Inc.
 Address City IN Zip: 2500 Marion Dr, Kendallville, Indiana 46755
 Permit Number: F113-29548-00021
 Reviewer: Marcia Earl
 Date: August 2010

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (feet/min)	MAXIMUM PRINT WIDTH (inches)	MMin ² /year
Lithoman	2211	56.50	787905

INK VOCS						
Ink Name Press Id	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off %	Thermal Oxidizer Destruction Efficiency %	Throughput (MMin ² /year)	Emissions (tons/year)
Ink-Process Black	4	35%	80.00%	95.00%	787905	435.68
Ink-Process Blue	4	40%	80.00%	95.00%	787905	499.47
Ink-Process Red	4	41%	80.00%	95.00%	787905	511.07
Ink-Process Yellow	4	44%	80.00%	95.00%	787905	552.79
Fountain Solution (Emerald AMVP)	0.15	87%	100.00%	66.50%	787905	51.65
Cleaning Solvent (A-60 Odorless)	0.14	97%	50.00%	0.00%	787905	26.69
Cleaning Solvent (LPC)	0.14	92%	50.00%	0.00%	787905	25.48
Misc	0.001	100%	100.00%	0.00%	787905	0.39

Total VOC Emissions =	631.53	tons/year
-----------------------	--------	-----------

METHODOLOGY

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.
 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 FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.
 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: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Dr, Kendallville, Indiana 46755
Permit Number: F113-29548-00021
Reviewer: Marcia Earl
Date: August 2010

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (feet/min)	MAXIMUM PRINT WIDTH (inches)	MMin ² /year
Lithoman 4	2844	56.50	1013479

INK VOCS					
Ink Name Press Id	Maxium Coverage (lbs/MMin ²)	Weight % Volatiles*	Flash Off %	Throughput (MMin ² /year)	Emissions (tons/year)
Ink-Process Black	4	35%	80.00%	1013479	560.41
Ink-Process Blue	4	40%	80.00%	1013479	642.46
Ink-Process Red	4	41%	80.00%	1013479	657.38
Ink-Process Yellow	4	44%	80.00%	1013479	711.06
Fountain Solution (Emerald AMVP)	0.15	87%	100.00%	1013479	66.43
Cleaning Solvent (A-60 Odorless)	0.14	97%	50.00%	1013479	34.34
Cleaning Solvent (LPC)	0.14	92%	50.00%	1013479	32.78
Misc	0.001	100%	100.00%	1013479	0.51

Total VOC Emissions =	812.33	tons/year
-----------------------	---------------	------------------

METHODOLOGY

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.

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 FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

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: Courier Kendallville, Inc.
 Address City IN Zip: 2500 Marion Dr, Kendallville, Indiana 46755
 Permit Number: F113-29548-00021
 Reviewer: Marcia Earl
 Date: August 2010

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (feet/min)	MAXIMUM PRINT WIDTH (inches)	MMin ² /year
Mark 16	1265	35.5	283241

INK VOCS					
Ink Name Press Id	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /year)	Emissions* (tons/year)
Ink - Process Black	1.3	34.57%	80.00%	283241	50.92
Ink - Process Cyan	1.3	40.54%	80.00%	283241	59.71
Ink - Process Magenta	1.3	39.62%	80.00%	283241	58.35
Ink - Process Yellow	1.3	43.84%	80.00%	283241	64.57
Ink - Book Black	1.3	31.63%	80.00%	283241	46.59
Ink - PMS Blue	1.3	41.85%	80.00%	283241	61.64
Fountain Solution	0.15	76.90%	100.00%	283241	16.34
Cleaning Solvent (A-60 Odorless)	0.06	96.80%	50.00%	283241	4.11
Cleaning Solvent (Impact System)	0.06	2.00%	50.00%	283241	0.08
Cleaning Solvent (LPC)	0.06	92.40%	50.00%	283241	3.93
MISC	0.0001	75.00%	100.00%	283241	0.01

Total VOC Emissions =	85.03	tons/year
-----------------------	--------------	-----------

METHODOLOGY

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.

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 FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

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: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Dr, Kendallville, Indiana 46755
Permit Number: F113-29548-00021
Reviewer: Marcia Earl
Date: August 2010

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (feet/min)	MAXIMUM PRINT WIDTH (inches)	MMin ² /year
M850 (Heatsset Web Offset)	1600	37.5	378432

INK VOCS					
Ink Name Press Id	Maximum Coverage '(lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /year)	Emissions* (tons/year)
Ink - Process Black	3	32.99%	80.00%	378432	149.81
Ink - Process Cyan	3	34.57%	80.00%	378432	156.99
Ink - Process Magenta	3	38.33%	80.00%	378432	174.06
Ink - Process Yellow	3	41.72%	80.00%	378432	189.46
Ink - Book Black	3	37.45%	80.00%	378432	170.07
Ink - PMS Yellow	3	37.43%	80.00%	378432	169.98
Fountain Solution	0.07	21.00%	100.00%	378432	2.78
Cleaning Solvent (A-60 Odorless)	0.03	96.80%	50.00%	378432	2.75
Cleaning Solvent (LPC)	0.03	4.70%	50.00%	378432	0.13
Cleaning Solvent (Impact System)	0.03	2.00%	50.00%	378432	0.06
Misc	0.0001	75.00%	100.00%	378432	0.01

Total VOC Emissions =	195.00	tons/year
-----------------------	--------	-----------

METHODOLOGY

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.

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 FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

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: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Dr, Kendallville, Indiana 46755
Permit Number: F113-29548-00021
Reviewer: Marcia Earl
Date: August 2010

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (feet/min)	MAXIMUM PRINT WIDTH (inches)	MMin ² /year
M130 (Heatset Web Offset)	1264	37.5	298961

INK VOCS					
Ink Name Press Id	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /year)	Emissions* (tons/year)
Ink - Process Black	4	32.99%	80.00%	298961	157.80
Ink - Process Cyan	4	34.57%	80.00%	298961	165.36
Ink - Process Magenta	4	38.33%	80.00%	298961	183.35
Ink - Process Yellow	4	41.72%	80.00%	298961	199.56
Ink - Book Black	4	37.45%	80.00%	298961	35.83
Ink - PMS Yellow	4	37.43%	80.00%	298961	179.04
Fountain Solution	0.07	21.00%	100.00%	298961	2.20
Cleaning Solvent (A-60 Odorless)	0.03	96.80%	50.00%	298961	2.17
Cleaning Solvent (LPC)	0.03	4.70%	50.00%	298961	0.11
Misc	0.0001	75.00%	100.00%	298961	0.01

Total VOC Emissions =	203.94	tons/year
-----------------------	---------------	------------------

METHODOLOGY

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.

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 FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

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: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Dr, Kendallville, Indiana 46755
Permit Number: F113-29548-00021
Reviewer: Marcia Earl
Date: August 2010

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (feet/min)	MAXIMUM PRINT WIDTH (inches)	MMin ² /year
Mark 6 (Heatset Web Offset)	950	35.5	212710

INK VOCS					
Ink Name Press Id	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /Year)	Emissions* (TONS/YEAR)
Ink - Book Black	0.87	37.45%	80.00%	212710	27.72
Ink - PMS Yellow	0.87	37.43%	80.00%	212710	27.71
Fountain Solution	0.07	21.00%	100.00%	212710	1.56
Cleaning solvent (A-60 Odorless)	0.03	96.80%	50.00%	212710	1.54
Cleaning Solvent (LPC)	0.03	4.70%	50.00%	212710	0.07
Misc	0.0001	75.00%	100.00%	212710	0.01

Total VOC Emissions =	30.84	(tons/year)
------------------------------	--------------	--------------------

METHODOLOGY

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.

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 FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

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: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Dr, Kendallville, Indiana 46755
Permit Number: F113-29548-00021
Reviewer: Marcia Earl
Date: August 2010

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (feet/min)	MAXIMUM PRINT WIDTH (inches)	MMin ² /year
Heidelberg Sheetfed	400	39.5	99654

INK VOCS					
Ink Name Press Id	Maximum Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off %	Throughput (MMin ² /year)	Emissions* (tons/year)
Ink - Process Black	3	5.00%	5.00%	99654	0.37
Ink - Process Cyan	3	5.00%	5.00%	99654	0.37
Ink - Process Magenta	3	5.00%	5.00%	99654	0.37
Ink - Process Yellow	3	5.00%	5.00%	99654	0.37
Ink - PMS	3	18.00%	5.00%	99654	1.35
Fountain Solution (ARS-JP)	0.54	84.05%	5.00%	99654	1.13
Fountain Solutions (Emerald JRZ)	0.54	21.00%	5.00%	99654	0.28
Cleaning Solvent (Color Wash 1)	0.05	90.00%	50.00%	99654	1.12
Cleaning Solvent (505 Wash)	0.05	100.00%	50.00%	99654	1.25
Clean Solvent (Low VOC MRC)	0.05	100.00%	50.00%	99654	1.25
Cleaning Solvent (Color Wash 2)	0.05	100.00%	50.00%	99654	1.25
Misc.	0.0001	75.00%	100.00%	99654	3.74E-03

Total VOC Emissions =	3.72	tons/year
-----------------------	-------------	------------------

METHODOLOGY

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.

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 FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.

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
HAP Emissions for Printing Presses**

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Dr, Kendallville, Indiana 46755
Permit Number: F113-29548-00021
Reviewer: Marcia Earl
Date: August 2010

Material	Maximum Print Width (inches)	Maximum Line Speed (feet/min)	Maximum Coverage (lbs/MMin ²)	Flash Off %	Weight % Xylene	Weight % Diethanolamine	Weight % Napthalene	Weight % Cumene	Weight % Glycol Ethers	Weight % Ethyl Benzene	Weight % Hexane	Xylene Emissions (ton/yr)	Diethanolamine Emissions (ton/yr)	Napthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Total HAPs per coating (ton/yr)	
Printing Press Mark 6 LPC	35.50	950	0.14	50.0%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.74	0.00	0.00	0.74	
Printing Press Mark 16 LPC	35.50	1265	0.14	50.0%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.99	0.00	0.00	0.99	
Printing Press M130 LPC	37.50	1264	0.14	50.0%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	1.05	0.00	0.00	1.05	
Printing Press M850 LPC	37.50	1600	0.14	50.0%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	2.65	0.00	0.00	2.65	
Heidelberg Sheetfed Press																				Total VOC's Heidelberg Sheetfed
Blanket Cleaner 505	39.50	400	0.05	50.0%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.62	0.00	0.00	0.00	0.00	0.00	0.00	0.62	
Low VOC Mrc	39.50	400	0.05	50.0%	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.19	0.00	0.00	0.00	0.00	0.00	0.00	0.19	1.02
Color Wash #1	39.50	400	0.05	50.0%	0.00%	0.00%	1.30%	0.00%	0.00%	0.00%	0.00%	0.00	0.02	0.02	0.00	0.00	0.00	0.00	0.03	
Ultra Clean #2	39.50	400	0.05	50.0%	4.00%	3.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.04	0.04	0.00	0.10	0.00	0.00	0.00	0.18	
Lithoman Press Emerald AMVP	56.50	2211	0.15	100%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	8.86	0.00	0.00	8.86	Total VOC's Lithoman
A-60 Odorless and LPC	56.50	2211	0.14	50.0%	5.00%	0.00%	0.00%	5.00%	0.00%	1.00%	0.00%	1.38	0.00	0.00	1.38	0.00	0.28	0.00	3.03	11.94
Misc	56.50	2211	0.001	100.0%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	1.88%	0.00	0.00	0.00	0.00	0.04	0.00	0.01	0.05	
Lithoman 2 Press Emerald AMVP	56.50	2211	0.15	100%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	8.86	0.00	0.00	8.86	Total VOC's Lithoman
A-60 Odorless and LPC	56.50	2211	0.14	50.0%	5.00%	0.00%	0.00%	5.00%	0.00%	1.00%	0.00%	1.38	0.00	0.00	1.38	0.00	0.28	0.00	3.03	11.94
Misc	56.50	2211	0.001	100%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	1.88%	0.00	0.00	0.00	0.00	0.04	0.00	0.01	0.05	
Lithoman 3 Press Emerald AMVP	56.50	2211	0.15	100%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	8.86	0.00	0.00	8.86	Total VOC's Lithoman
A-60 Odorless and LPC	56.50	2211	0.14	50.0%	5.00%	0.00%	0.00%	5.00%	0.00%	1.00%	0.00%	1.38	0.00	0.00	1.38	0.00	0.28	0.00	3.03	11.94
Misc	56.50	2211	0.001	100%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	1.88%	0.00	0.00	0.00	0.00	0.04	0.00	0.01	0.05	
Lithoman 4 Press Emerald AMVP	56.50	2844	0.15	100%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	11.40	0.00	0.00	11.40	Total VOC's Lithoman
A-60 Odorless and LPC	56.50	2844	0.14	50.0%	5.00%	0.00%	0.00%	5.00%	0.00%	1.00%	0.00%	1.77	0.00	0.00	0.00	0.00	0.35	0.00	2.13	13.59
Misc	56.50	2844	0.001	100%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	1.88%	0.00	0.00	0.00	0.00	0.05	0.00	0.01	0.06	
Total												6.76	0.05	0.016	4.24	43.59	1.18	0.03	55.87	

METHODOLOGY

Totals are worst case ink, plus the fountain solution, plus the worst case cleaning solvent, plus misc.
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
HAP Emissions (tons/yr) = Maximum Coverage pounds per MMin² * Weight percentage HAP * Flash off * Throughput * Tons per 2000 pounds
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%. 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

Natural Gas Combustion Only

MM BTU/HR <100

Natural Gas Combustion from Entire Source

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Dr, Kendallville, IN 46755
Permit Number: F113-29548-00021
Reviewer: Marcia Earl
Date: August 2010

Unit	MMBtu/hr
Mark 16	5.86
M850	8.80
Mark 6	5.12
M130	8.00
Lithoman dryer	10.50
Cleanswitch	0.810
Lithoman 2 dryer	10.50
Cleanswitch 2	0.810
Lithoman 3 dryer	5.25
TNV 1	5.25
Lithoman 4 dryer	6.80
TNV 2	6.8
Insignificant	9.31
Total	83.81

Heat Input Capacity
MMBtu/hr

83.81

Potential Throughput
MMCF/yr

734.18

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	1.90	7.60	7.60	0.600	100	5.50	84.0
					**see below		
Potential Emission in tons/yr	0.70	2.79	2.79	0.22	36.71	2.02	30.84

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculati

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Natural Gas Combustion from Entire Source
 HAPs Emissions**

Company Name: Courier Kendallville, Inc.
Address City IN Zip: 2500 Marion Dr, Kendallville, Indiana 46755
Permit Number: F113-29548-00021
Reviewer: Marcia Earl
Date: August 2010

Potential Throughput
 MMCF/yr

734.18

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80	Toluene 3.40E-03
Potential Emission in tons/yr	7.71E-04	4.41E-04	2.75E-02	0.66	1.25E-03

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03	Total
Potential Emission in tons/yr	1.84E-04	4.04E-04	5.14E-04	1.39E-04	7.71E-04	0.693

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
 VOC Emissions for Binding Operations

Company Name: Courier Kendallville, Inc.
 Address City IN Zip: 2500 Marion Dr, Kendallville, Indiana 46755
 Permit Number: F113-29548-00021
 Reviewer: Marcia Earl
 Date: August 2010

Norm Binder

	<u>Amount (Lbs)</u>		<u>VOC/HAP % by Wt.</u>		<u>Emission Factor</u>		<u>VOC/HAP Emissions</u>
Cover Glue Hot 2H782	129,800	x	0.0010	x	1	=	129.80 lbs
Side Glue Hot 2H858	7,921	x	0.0010	x	1	=	7.92 lbs
Primer Glue Cold 46939	10,800	x	0.00208	x	1	=	22.46 lbs
Total Actual							160.19 lbs
Total Actual							0.02 lbs/hr
Hours of Operation	7378	hrs					
Total Potential							380.38 lbs 0.19 tpy

Kolbus Binder

	<u>Amount (Lbs)</u>		<u>VOC/HAP % by Wt.</u>		<u>Emission Factor</u>		<u>VOC/HAP Emissions</u>
Cover Glue Hot 2H662	50,000	x	0.0014	x	1	=	70.00 lbs
Side Glue Hot 2H858	10,078	x	0.0010	x	1	=	10.08 lbs
Total Actual							80.08 lbs
Total Actual							0.01 lbs/hr
Hours of Operation	6361	hrs					
Total Potential							110.28 lbs 0.055 tpy

K2

	<u>Amount (Lbs)</u>		<u>VOC/HAP % by Wt.</u>		<u>Emission Factor</u>		<u>VOC/HAP Emissions</u>
Spine Glue Hot 2H932	60,207	x	0.0010	x	1	=	60.21 lbs
Headband Paste Hot V3869EN	132	x	0.00316	x	1	=	0.42 lbs
Casing-In Paste 834-77-1	13,504	x	0	x	1	=	0.00 lbs
Total Actual							60.62 lbs
Total Actual							0.01 lbs/hr
Hours of Operation	4109	hrs					
Total Potential							129.24 lbs 0.065 tpy

Corrana Binder

	<u>Amount (Lbs)</u>		<u>VOC/HAP % by Wt.</u>		<u>Emission Factor</u>		<u>VOC/HAP Emissions</u>
Hot Melt HL3178X	146,025	x	0.00213	x	1	=	311.03 lbs
Primer WB1798	21,061	x	0.0051	x	1	=	107.41 lbs
Total Actual							418.44 lbs
Total Actual							0.06 lbs/hr
Hours of Operation	7378	hrs					
Total Potential							496.83 lbs 0.248 tpy
Total							0.558

Potential to emit (tons/yr) = Amount (Pounds) * (VOC/HAP % by Wt.) * (8760 hours/Hours of Operation) * (1 ton/2000 pounds)

Indiana Department of Environmental Management Office of Air Quality

Attachment A – BACT Analyses Technical Support Document (TSD) Significant Permit Revision of a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Courier Kendallville, Inc.
Source Location:	2500 Marion Drive, Kendallville, Indiana 46755
County:	Noble
SIC Code:	2752
Operation Permit No.:	F113-20736-00021
Operation Permit Issuance Date:	May 30, 2007
Significant Permit Revision No.:	113-29548-00021
Permit Reviewer:	Summer Keown

Background Information

The Office of Air Quality (OAQ) has reviewed the significant permit modification application from Courier Kendallville, Inc., relating to the construction and operation of a stationary heat set web offset lithographic printing press. On September 21, 2010, the Office of Air Quality (OAQ) received an application from Courier Kendallville, Inc. requesting to construct and operate a new heat set web offset lithographic printing press, located at 2500 Marion Drive, Kendallville, Indiana, in Noble County. Courier Kendallville, Inc. was issued FESOP Renewal F113-20736-00021 on May 30, 2007.

The proposed Significant Permit Revision will consist of adding the following emission unit:

- (a) One (1) heat set web offset lithographic printing press (consisting of four (4) printing units), identified as Lithoman 4, approved for construction in 2010, exhausting through stack TNV 2, with a maximum line speed of 2,844 feet per minute and a maximum printing width of 56.5 inches. The press is equipped with one (1) natural gas-fired dryer, identified as Lithoman 4 dryer, exhausting to one (1) stack, identified as TNV 2, with a maximum heat input rate of 6.80 million British thermal units per hour.

The potential VOC emissions of the proposed heat set web offset lithographic printing press is greater than twenty-five (25) tons per year, and there are no other rules under 326 IAC 8 that apply. Therefore, the requirements of 326 IAC 8-1-6 (Best Available Control Technology (BACT)) are applicable to this permit revision. Appendix A - Emission Calculations - of this TSD contain the potential emission calculations for this unit.

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.

- (1) Identify all potentially available control options;
- (2) Eliminate technically infeasible control options;

- (3) Rank remaining control technologies;
- (4) Evaluate the most effective controls and document the results; and
- (5) Select BACT.

Also in accordance with the *“Top-Down” Best Available Control Technology Guidance Document* outlined in the 1990 draft U.S. EPA *New Source Review Workshop Manual*, BACT analyses take into account the energy, environmental, and economic impacts of the control options. 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 adverse environmental effects to public health and the environment.

VOC BACT Analysis

Step One: Identify All Potentially Available Control Technologies

The following potentially available control technologies were identified for controlling VOC emissions from the proposed heat set web offset lithographic printing press:

(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).

(c) Carbon Adsorption

Carbon adsorption works through the preferential adsorption of the organic molecules from the effluent gas onto the surface of the solid granules of carbon where they are held by physical attraction. This control technology typically operates best with vapor streams that have low variation in volatile concentration and type. In effluent streams where there are multiple organic compounds present, competing adsorption occurs where a number of organics compete for the number of available adsorption sites on the carbon. This lessens the capture efficiency for some individual species. VOC removal efficiency for this type of system may vary depending on several factors, but are capable of achieving 90 to 99% removal efficiencies.

Step Two: Eliminate Technically Infeasible Control Options

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 evaluated below.

(a) Thermal Oxidation

Thermal oxidation is a technically feasible option. The source has thermal oxidizers in place for current operations. The recuperative thermal oxidizer is integrated with the web press dryer.

(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, causing the destruction efficiency to degrade over time.

(c) Carbon Adsorption

Carbon adsorption is a technically infeasible option due to the differing coating formulations used at Lithoman 4. This technology is best suited for low variations in the type and concentration of VOC (risk). The formulations used at Lithoman 4 vary significantly.

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
Courier Kendallville, Inc.	2006	Printing presses	Recuperative thermal oxidizer with minimum VOC destruction efficiency of 98% in conjunction with the following limitations: VOC content of the fountain solution shall be no greater than 3% VOC as applied. 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 lbs/gal as applied.	Indiana Federally Enforceable State Operating Permit Significant Permit Revision No. 113-23204-00021
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	EPA RACT/BACT/LAER Clearinghouse (RBLCL) Search for Printing Press Controls ID: PA-0261

Williams Printing Company - East Point, GA	2005	Printing presses	Thermal oxidizer with 97% destruction efficiency. Fountain solution: 5% VOC, blanket wash vapor pressure limit of 10mmHg or 2.5 lb VOC/gal;	EPA RACT/BACT/LAER Clearinghouse (RBLC) Search for Printing Press Controls 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	EPA RACT/BACT/LAER Clearinghouse (RBLC) Search for Printing Press Controls ID: WI-0222

Step Three: Rank Feasible Technologies

Courier Kendallville, Inc. has opted to adopt the option with the greatest control efficiency. Therefore, it is unnecessary to discuss the feasibility of the potential control options with lesser control efficiencies.

	Recuperative Thermal Oxidation (Top BACT)
Destruction Efficiency	98%
Expected Emission Rates Before Controls	812.33 tons/year
Expected Emissions Reduction	796.08 tons/year
Expected Emission Rates After Controls	16.25 tons/year

Step Four: Evaluate Top Control Alternatives

Recuperative 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 recuperative thermal oxidizer system to control VOC emissions from other presses onsite, and proposes that the VOC emissions from the proposed heat set web offset lithographic printing presses be controlled by this existing control system.

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 proposed heat set web offset lithographic printing press, identified as Lithoman 4, shall be as follows:

- (a) The exhaust shall be vented to the one (1) integrated recuperative thermal oxidizer (TNV 2) with a minimum of 98% destruction efficiency for VOC as demonstrated by achieving a VOC outlet concentration of 10 ppmv or less as hexane, minus methane and ethane;
- (b) The VOC content of the fountain solution shall be no greater than 3% VOC as applied;
- (c) 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
- (d) The capture efficiencies used for reporting compliance shall be as follows and are based on the U.S. EPA's "Alternative Control Techniques Document: Offset Lithographic Printing" (EPA 453/R-94-054, June 1994) and Control Techniques Guideline For Control of Volatile Organic Compound Emissions from Offset Lithographic Printing" (EPA September 1993):

- (1) 100 percent capture, by weight, of the VOC in press ready inks;
- (2) 70 percent capture, by weight, of the VOC in press ready fountain solutions;
- (3) 40 percent capture, by weight, of the VOC in press ready automatic cleaning solvents.
- (4) 20 percent retention, by weight, of VOC in inks in the paper substrate; and
- (5) 50 percent 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).

IDEM Contact

Questions regarding this proposed permit can be directed to Summer Keown at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.



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: Christine Bitner
Courier Kendallville, Inc.
2500 Marion Dr.
Kendallville IN 46755

DATE: Jan. 3, 2011

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

SUBJECT: Final Decision
Significant Permit Revision
113-29548-00021

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:
Joseph Brennan VP-Engineering Courier Kendallville, Inc.
Gary Jones Printing Industries of America
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

Jan. 3, 2011

TO: Kendallville Public Library

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

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

Applicant Name: Courier Kendallville, Inc.
Permit Number: 113-29548-00021

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	BMILLER 1/3/2011 Courier Kendallville, Inc. 113-29548-00021 (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		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Christine Bitner Courier Kendallville, Inc. 2500 Marion Dr Kendallville IN 46755 (Source CAATS) Via Confirm Delivery									
2		Joseph Brennan VP - Engineering Courier Kendallville, Inc. 15 Wellman Ave N Celmsford MA 01863 (RO CAATS)									
3		Noble County Board of Commissioners 101 North Orange Street Albion IN 46701 (Local Official)									
4		Noble County Health Department 2090 N. State Rd 9, Suite C Albion IN 46701-9566 (Health Department)									
5		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)									
6		Kendallville Public Library 221 S Park Avenue Kendallville IN 46755-1740 (Library)									
7		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)									
8		Kendallville City Council and Mayors Office 234 S. Main Street Kendallville IN 46755 (Local Official)									
9		Gary Jones Printing Industries of America 200 Deer Run Road Sewickley PA 15143 (Consultant)									
10		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
---	--	--	--