



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
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: May 3, 2013

RE: Mignone Communications, Inc., Division of EP Graphics, Inc. / 069 - 33080 - 00059

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



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May 3, 2013

Mr. Mike Broom
Mignone Communications, Inc., Division of EP Graphics, Inc.
880 E. State St.
Huntington, IN 46750

Re: 069-33080-00059
Third Administrative Amendment to
F069-25446-00059

Dear Mr. Broom:

Mignone Communications, Inc., Division of EP Graphics, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) (Renewal) No. F069-25446-00059 on December 5, 2008 for a stationary commercial printing facility located at 860 & 880 East State Street, Huntington, Indiana. On April 12, 2013, the Office of Air Quality (OAQ) received an application from the source requesting to:

- (a) Pursuant to 326 IAC 2-8-10(a)(2)(A), this change to the permit is considered an administrative amendment because the permit is amended to change the name, address or telephone number of any person identified in the permit.
- (b) Pursuant to 326 IAC 2-8-10(a)(4), this change to the permit is considered an administrative amendment because the permit is amended to indicate a change in ownership or operational control of the source where there is no other change in the permit is necessary.

The company name has been revised throughout the permit as follows:

Company Name: ~~Mignone Communications, Inc.~~
Mignone Communications, Inc., Division of EP Graphics, Inc.

Additional Changes

IDEM, OAQ made the additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

1. Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit (PTE) 100,000 tons per year or more of CO₂ equivalent emissions (CO₂e). Therefore, CO₂e emissions have been calculated for this source. Based on the calculations, the unlimited PTE GHGs from the entire source is less than 100,000 tons of CO₂e per year (see Appendix A for the calculations). This did not require any changes to the permit.
2. Section A.1 of the permit and the reporting forms have been revised to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.

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."
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 when the underlying rule states "within."
5. IDEM has decided to clarify throughout the permit that a certification needs to meet the requirements of 326 IAC 2-8-5(a)(1). In addition, IDEM has decided to remove the last sentence dealing with the need for certification from the forms because the conditions requiring the forms already addresses this issue.
6. IDEM has decided to clarify the certification requirements in Section B - Duty to Provide Information and Section B - Certification.
7. IDEM has decided to clarify the requirements of Section B – Preventive Maintenance Plan and to add a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans.
8. IDEM has revised 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.
9. IDEM has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM has removed Section B - Deviations 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.
10. IDEM has revised Section B - Permit Renewal paragraph (c) to state which rule establishes the authority to set a deadline for the Permittee to submit additional information.
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.
12. IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.
13. 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.
14. 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 change to clearly indicate that it is the Permittee that must follow the requirements of the condition
15. IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
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.

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.
19. The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.
20. IDEM has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.
21. 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.
22. The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report Form to match the underlying rule.

The permit has been revised as follows with deleted language as strikeouts and new language **bolded**:

SECTION A

SOURCE SUMMARY

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

...
Mailing Address: ~~880 East State Street, Huntington, Indiana 46750~~
...

SECTION B

GENERAL CONDITIONS

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.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,~~ **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) ~~One (1) certification shall be included, using~~ **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.

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

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

...
The submittal by the Permittee does require ~~the 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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- ~~(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:~~

- (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.

- (bc) 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 **and their submittal** do not require the certification 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).
- (ed) 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]

- (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:

- (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

The notification which shall be submitted by the Permittee does not require the 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).

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

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

- ~~(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 64-53 IGCN 1003
Indianapolis, Indiana 46204-2251~~

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification **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.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 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) 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.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

Any such application shall be certified ~~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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

~~The~~ **Any such** application which shall be submitted by the Permittee does require ~~the 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.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ ~~within~~ **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.

...

SECTION C SOURCE OPERATION CONDITIONS

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

- ...
- (b) ~~The~~ **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. ~~This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.~~

...

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:

...

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~~ **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.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.~~

AFor 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.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 and record-keeping requirements not already legally required, **the Permittee shall be allowed up to** ~~shall be implemented within~~ ninety (90) days **of from the date of** permit issuance or ~~ninety (90) days of~~ initial start-up, whichever is later, **to begin such monitoring**. 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 ~~the Permittee's~~ control, **that any monitoring equipment required by this permit cannot be installed and operated within** ~~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 ~~the 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.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63] Reserved~~

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

...
C.14 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) ~~Upon detecting an excursion or exceedance, the~~ **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 ~~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.** **The response** may include, but ~~are~~ **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 ~~within the indicator range, designated condition, or below the applicable emission limitation or standard,~~ as applicable **normal or usual manner of operation.**
- ...
- (e) The Permittee shall ~~record~~ **maintain** the following records **the reasonable response steps taken.:**
- (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~~ **its** response actions to IDEM, OAQ, ~~within no later than thirty (30) days of receipt of the test results~~ **seventy-five (75) days after the date of the test.** ~~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~~ **no later than** one hundred and ~~twenty (120) days of receipt of the original test results~~ **eighty (180) days after the date of the test.** Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred ~~twenty (120)~~ **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 ~~the 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.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- ...
- (b) Unless otherwise specified in this permit, **for all record keeping requirements not already legally required, the Permittee shall be allowed up to shall be implemented within 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.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. **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 ~~with~~ **not later than** thirty (30) days ~~of~~ **after** the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include ~~the 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 report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to~~ **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

- ...
- (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).~~
- (de) 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.

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~~ **applicable** 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.~~

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 heatset lithographic web presses (identified as Presses #1 & #3).~~

Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

...
D.1.10 Reporting Requirements

~~A quarterly summary of the information to document the compliance status with Conditions D.1.1 - D.1.2 shall be submitted to the addresses 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 no later than thirty (30) days after the end of the quarter being reported. Section 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 the a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by the an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

...
FESOP CERTIFICATION FORM:

...
Mailing Address: ~~880 East State Street, Huntington, Indiana 46750...~~

FESOP EMERGENCY OCCURRENCE REPORT FORM:

...
Mailing Address: ~~880 East State Street, Huntington, Indiana 46750~~

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

...
FESOP QUARTERLY REPORT FORM:

...
Mailing Address: ~~880 East State Street, Huntington, Indiana 46750~~

...
~~Attach a signed certification to complete this report.~~

...
FESOP QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT FORM:

...
Mailing Address: ~~880 East State Street, Huntington, Indiana 46750~~

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, 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".

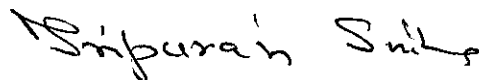
...
~~Attach a signed certification to complete this report.~~

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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

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 Bruce Farrar of my staff at 317-234-5401 or 1-800-451-6027, and ask for extension 4-5401.

Sincerely,



Tripurari P. Sinha, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit

TS/bf

cc: File - Huntington County
Huntington County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
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

Mignone Communications, Inc., Division of EP Graphics, Inc.
860 & 880 East State Street
Huntington, Indiana 46750

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

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

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

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

| | |
|--|--|
| Operation Permit No.: F069-25446-00059 | |
| Issued by/Original Signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality | Issuance Date: December 5, 2008 Expiration Date: December 5, 2018 |

First Administrative Amendment No.: 069-27551-00059, issued March 27, 2009.
Second Administrative Amendment No.: 069-28860-00059, issued January 27, 2010.

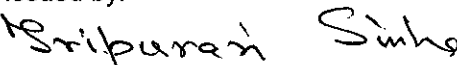
| | |
|---|---|
| Third Administrative Amendment No.: 069-33080-00059 | |
| Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality | Issuance Date: May 3, 2013 Expiration Date: December 5, 2018 |

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary commercial printing source.

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

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

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

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

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

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

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

- (a) Two (2) heatset lithographic web press operations, consisting of:
 - (1) One (1) five-color heatset lithographic web press, identified as Press #1, maximum operating rate: fourteen hundred (1,400) feet per minute, maximum printing capacity: thirty-eight and two-tenths (38.2) million square inches per hour (MMin²/hr), constructed in 1998, exhausting to Dryer #1.
 - (2) One (1) natural gas-fired dryer, identified as Dryer #1, constructed in 1998, rated at two and forty-two hundredths (2.42) million British thermal units per hour (MMBtu/hr), exhausting to a regenerative thermal oxidizer (RTO1).

- (3) One (1) six-color heatset lithographic web press, identified as Press #3, maximum operating rate: thirteen hundred seventy-eight (1,378) feet per minute, maximum printing capacity: nineteen and eighty-four hundredths (19.84) million square inches per hour (MMin²/hr), constructed in 2004, exhausting to Dryer #3.
- (4) One (1) natural gas-fired dryer, identified as Dryer #3, rated at one and thirteen hundredths (1.13) million British thermal units per hour (MMBtu/hr), constructed in 2004, exhausting to a regenerative thermal oxidizer (RTO1).

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

- (b) One (1) non-heatset lithographic web press operation, consisting of:
 - (1) One (1) nine-color non-heatset lithographic web press, identified as Press #2, maximum operating rate: twenty-eight hundred forty-four (2,844) feet per minute, maximum printing capacity: seventy-one and sixty-seven hundredths (71.67) million square inches per hour (MMin²/hr), constructed in 2001, exhausting inside the building, and located at the Print Support, Inc. plant.

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

- (c) One (1) Heidelberg GTO, two-color sheetfed lithographic press, identified as Press #4, maximum operating rate: eight thousand (8000) sheets per hour, maximum printing capacity: two and twenty-four hundredths (2.24) million square inches per hour (MMin²/hr), approved for construction in 2009.
- (d) Trimmers that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone, including bindery and finish trimmers. [326 IAC 2-1.1-3(e)(14)] Emission units matching this description include:
 - (1) One (1) binding and finish trimming operation, installed in 2001, with a dust collection system utilizing a fabric filter for particulate control, with a maximum capacity of thirteen thousand standard cubic feet per minute (13,000 scfm), and exhausting inside the building,.
- (e) Natural gas-fired combustion sources with heat input less than or equal to ten million (10,000,000) British thermal units per hour (MMBtu/hr), including:
 - (1) One (1) natural gas-fired comfort heater rated at one hundred thirty-one thousandths (0.131) million British thermal units per hour (MMBtu/hr), installed in 2001, exhausting inside the building,
- (f) One (1) small label press (a.k.a. ink jet printer), with negligible VOC emissions.
- (g) Pre-press operations, including plate processing and film developing, both with negligible VOC emissions.
- (h) One (1) bailer.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F069-25446-00059, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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 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.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

The submittal by the Permittee does require 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.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) 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 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.12 Emergency Provisions [326 IAC 2-8-12]

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

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

Facsimile Number: 317-233-6865

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

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

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

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

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

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

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

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

B.15 Reserved

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application 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.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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 demolitions start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

- (a) 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 within 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 Reserved

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]

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.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 submit a description of its response actions to IDEM, OAQ, not 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.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, 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.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- 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.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 applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) heatset lithographic web press operations, consisting of:
- (1) One (1) five-color heatset lithographic web press, identified as Press #1, maximum operating rate: fourteen hundred (1,400) feet per minute, maximum printing capacity: thirty-eight and two-tenths (38.2) million square inches per hour (MMin²/hr), constructed in 1998, exhausting to Dryer #1.
 - (2) One (1) natural gas-fired dryer, identified as Dryer #1, constructed in 1998, rated at two and forty-two hundredths (2.42) million British thermal units per hour (MMBtu/hr), exhausting to a regenerative thermal oxidizer (RTO1).
 - (3) One (1) six-color heatset lithographic web press, identified as Press #3, maximum operating rate: thirteen hundred seventy-eight (1,378) feet per minute, maximum printing capacity: nineteen and eighty-four hundredths (19.84) million square inches per hour (MMin²/hr), constructed in 2004, exhausting to Dryer #3.
 - (4) One (1) natural gas-fired dryer, identified as Dryer #3, rated at one and thirteen hundredths (1.13) million British thermal units per hour (MMBtu/hr), constructed in 2004, exhausting to a regenerative thermal oxidizer (RTO1).

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

- (b) One (1) non- heatset lithographic web press operation, consisting of:
- (1) One (1) nine-color non-heatset lithographic web press, identified as Press #2, maximum operating rate: twenty-eight hundred forty-four (2,844) feet per minute, maximum printing capacity: seventy-one and sixty-seven hundredths (71.67) million square inches per hour (MMin²/hr), constructed in 2001, exhausting inside the building, and located at the Print Support, Inc. plant.

Insignificant Activities

- (c) One (1) Heidelberg GTO, two-color sheetfed lithographic press, identified as Press #4, maximum operating rate: eight thousand (8000) sheets per hour, maximum printing capacity: two and twenty-four hundredths (2.24) million square inches per hour (MMin²/hr), approved for construction in 2009.

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

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

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

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

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

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

Pursuant to 326 IAC 8-2-5, no owner or operator of a coating line may permit the discharge into the atmosphere of any VOC in excess of two and nine tenths (2.9) pounds VOC per gallon of coating, excluding water, or the equivalent emission limit as determined from the equation in 326 IAC 8-1-2 (b).

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

(a) For heatset presses #1 & #3

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

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

Where:

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

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

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

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

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

This equivalency shall be determined using the following equation:

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

Where:

- L= Applicable emission limit from 326 IAC 8, in pounds of VOC per gallon of coating, less water;
- D= Baseline solvent density of VOC in the coating shall be equal to seven and thirty-six hundredths (7.36) pounds of VOC per gallon of solvent;
- E= Equivalent Emission Limit in pounds of VOC per gallon of coating solids, as applied. For the 326 IAC 8-2-5 limit of 2.9 lbs VOC/gal coating, less water, the equivalent emission limit, E = 4.79 lbs VOC/gal solids.

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

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

Where:

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

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

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

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

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

Where:

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

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

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

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

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

A Preventive Maintenance Plan is required for the heatset lithographic web presses (identified as Presses #1 & #3) the trimmer, and their respective 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 VOC Control System [326 IAC 2-8-4] [326 IAC 8-1-12]

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

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

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

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

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

- (a) In order to comply with Conditions D.1.1 & D.1.2, the Permittee shall conduct Compliance tests on the regenerative thermal oxidizer RTO1, to determine the minimum combustion zone temperature at which ninety-five percent (95%) of volatile organic compounds are destroyed. This test shall be performed on the regenerative thermal oxidizer RTO1 at least once every five (5) years from the date of the previous valid compliance demonstration. The stack test shall be performed utilizing Method 25 or 25A (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) In order to comply with Conditions D.1.1 & D.1.2, the Permittee shall conduct Compliance tests to verify VOC capture efficiency of the regenerative thermal oxidizer (identified as RTO1). This test shall be performed at least once every five (5) years from the date of the previous valid Compliance demonstration, utilizing EPA Method 204 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing. The last compliance stack testing was conducted on August 4, 2004.
- (c) In addition to the requirements stated above, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

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

D.1.7 Continuous Monitoring System - RTO

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

D.1.8 Parametric Monitoring

- (a) The Permittee shall determine duct (static) pressure (or fan amperage) from the most recent valid stack test that demonstrates compliance with Condition D.1.6, as approved by IDEM. A normal range for the duct (static) pressure (or fan amperage) shall be determined from the most recent compliant stack test

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

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

D.1.9 Record Keeping Requirements

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

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirement

A quarterly summary of the information to document the compliance status with Conditions D.1.1 - D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (d) Trimmers that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone, including bindery and finish trimmers. 326 IAC 2-1.1-3(e)(14) Emission units matching this description include:
- (1) One (1) binding and finish trimming operation, installed in 2001, with a dust collection system utilizing a fabric filter for particulate control, a maximum capacity of thirteen thousand standard cubic feet per minute (13,000 scfm), and exhausting inside the building.

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

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

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

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

Compliance Determination Requirement

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

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

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

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

Source Name: Mignone Communications, Inc., Division of EP Graphics, Inc.
Source Address: 860 & 880 East State Street, Huntington, Indiana 46750
FESOP Permit No.: F069-25446-00059

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE 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: Mignone Communications, Inc., Division of EP Graphics, Inc.
Source Address: 860 & 880 East State Street, Huntington, Indiana 46750
FESOP Permit No.: F069-25446-00059

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: Mignone Communications, Inc., Division of EP Graphics, Inc.
 Source Address: 860 & 880 East State Street, Huntington, Indiana 46750
 FESOP Permit No.: F069-25446-00059
 Facility: Lithographic Web Presses #1, #2 and #3 and sheetfed lithographic press
 (Press #4)
 Parameter: Volatile Organic Compounds (VOC)
 Limit: 99 tons per twelve (12) consecutive month period

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

VOC emitted (tons) = [VOC input at Presses #1 and #3 (tons) X 80% flash off X (100 - 95% overall control efficiency (or the efficiency obtained during the most recent valid compliance demonstration))] + [VOC input at Press #2 (tons) X 5% flash off] + [VOC input at Press #4 (tons) X 5% flash off] + [VOC usage from all cleaners and solvents (tons)]

YEAR: _____

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

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

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

**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: Mignone Communications, Inc., Division of EP Graphics, Inc.
Source Address: 860 & 880 East State Street, Huntington, Indiana 46750
FESOP Permit No.: F069-25446-00059

Months: _____ to _____ Year: _____

Page 1 of 2

| | |
|--|-------------------------------|
| <p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, 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: _____

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

**Company Name: Mignone Communications, Inc., Division of EP Graphics,
Address City IN Zip: 880 East State Street, Huntington, Indiana 46750
FESOP Administrative Amendment: 069-33080-00059
Reviewer: Bruce Farrar**

Summary of Unlimited Potential Emissions

| Emission Unit or Emitting Activity | PM (tons/yr) | PM ₁₀ (tons/yr) | PM _{2.5} (tons/yr) | SO ₂ (tons/yr) | NO _x (tons/yr) | VOC (tons/yr) | CO (tons/yr) | GHG as CO ₂ e | Cumene (tons/yr) | Xylene (tons/yr) | Glycol Ethers (tons/yr) | PTE Combined HAP (tons/yr) |
|------------------------------------|-----------------|-------------------------------|--------------------------------|------------------------------|------------------------------|------------------|-----------------|-----------------------------|---------------------|---------------------|-------------------------------|----------------------------------|
| Press #1 | - | - | - | - | - | 303.41 | - | | 0.242 | 0.302 | 1.788 | 2.332 |
| Press #3 | - | - | - | - | - | 157.18 | - | | 0.125 | 0.156 | 0.93 | 1.208 |
| Press #2 | - | - | - | - | - | 45.76 | - | | 0.502 | 0.628 | 3.35 | 4.476 |
| Insignificant Activities | 0.05 | 0.20 | 0.20 | 0.02 | 2.57 | 0.14 | 2.16 | 3,100 | - | - | - | 0.048 |
| Total | 0.05 | 0.20 | 0.20 | 0.02 | 2.57 | 506.50 | 2.16 | 3,100 | 0.87 | 1.09 | 6.06 | 8.06 |

Summary of Potential Emissions After Limits

| Emission Unit or Emitting Activity | PM (tons/yr) | PM ₁₀ (tons/yr) | PM _{2.5} (tons/yr) | SO ₂ (tons/yr) | NO _x (tons/yr) | VOC (tons/yr) | CO (tons/yr) | GHG as CO ₂ e | Cumene (tons/yr) | Xylene (tons/yr) | Glycol Ethers (tons/yr) | PTE Combined HAP (tons/yr) |
|------------------------------------|-----------------|-------------------------------|--------------------------------|------------------------------|------------------------------|------------------|-----------------|-----------------------------|---------------------|---------------------|-------------------------------|----------------------------------|
| Press #1 | - | - | - | - | - | - | - | | 0.001 | 0.002 | 0.009 | 0.012 |
| Press #3 | - | - | - | - | - | <99 | - | | 0.001 | 0.001 | 0.005 | 0.006 |
| Press #2 | - | - | - | - | - | - | - | | 0.502 | 0.628 | 3.346 | 4.476 |
| Insignificant Activities | 0.05 | 0.20 | 0.20 | 0.02 | 2.57 | 0.14 | 2.16 | 3,100 | - | - | - | 0.048 |
| Total | 0.05 | 0.20 | 0.20 | 0.02 | 2.57 | <99.9 | 2.16 | 3,100 | 0.50 | 0.63 | 3.36 | 4.54 |

Appendix A: Emission Calculations Press Throughput

Company Name: Mignone Communications, Inc., Division of EP Graphics,
Address City IN Zip: 880 East State Street, Huntington, Indiana 46750
FESOP Administrative Amendment: 069-33080-00059
Reviewer: Bruce Farrar
Date: August 12, 2008

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

NOTE: Source has agreed to limit the throughput for Press #2 to 750 million square inches per 24 hour day (MMin²/24 hr).

Methodology

⁽¹⁾ Maximum Hourly Press Throughput for Web Presses (MMin²/hr) = Max Print Width (in) x Max Press Speed (ft/min) x 12 (in/ft) x 60 (min/hr) / 1,000,000 (in²/MMin²)

⁽²⁾ Maximum Daily Throughput For Web Press (MMin²/24 hr) = Maximum Throughput (Mmin²/hr) x 24 hr/day

⁽²⁾ Maximum Yearly Throughput For Web Press (MMin²/yr) = Maximum Throughput (Mmin²/hr) x 8,760 (hr/yr)

⁽³⁾ Limited Press Throughput for Non-Heatset Web Press (#2) = Maximum Daily Throughput (Mmin²/24 hr) x 365

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

**Company Name: Mignone Communications, Inc., Division of EP Graphics,
Address City IN Zip: 880 East State Street, Huntington, Indiana 46750
FESOP Administrative Amendment: 069-33080-00059
Reviewer: Bruce Farrar
Date: August 12, 2008**

Emission Unit ID: Press #1

**Press Description: Goss Heatset
Construction Date: 1998**

VOC Emissions from Inks and Coatings

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

VOC Emissions from Fountain Solution and Press Cleaning

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

| | | |
|--------------------|---------------|----------------------|
| Press #1 | Before | After Control |
| Total VOC = | 303.41 | 1.52 |

HAP Emissions

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

| | | |
|-----------------------|---------------|----------------------|
| Combined HAP = | Before | After Control |
| | 2.33 | 0.0117 |

Methodology

⁽¹⁾ Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners are typical max usages for these types of presses

⁽²⁾ VOC Content (wt%) is determined from the MSDS for the "worst case" product within the product type used on the identified press

⁽³⁾ Flash off % is determined from the EPA document "Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing" (EPA 453/R-06-002, September 2006)

⁽⁴⁾ VOC PTE from Inks, Fountain Solutions, and Press Cleaners (tpy) = Maximum Coverage x VOC Content (wt%) x Flash Off % x Throughput x 1 ton/2000 pounds

⁽⁵⁾ VOC PTE from Inks, Fountain Solutions, and Press Cleaners (tpy) = Maximum Coverage x VOC Content (wt%) x Flash Off % x Throughput x 1 ton/2000 pounds x Control Efficiency (99%)

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

**Company Name: Mignone Communications, Inc., Division of EP Graphics,
Address City IN Zip: 880 East State Street, Huntington, Indiana 46750
FESOP Administrative Amendment: 069-33080-00059
Reviewer: Bruce Farrar
Date: August 12, 2008**

Emission Unit ID: Press #2

**Press Description: Dauphin Graphics
Construction Date: 2001**

Non-Heatset

VOC Emissions from Inks and Coatings

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

VOC Emissions from Fountain Solution and Press Cleaning

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

| |
|---------------------------------------|
| Press #2 Total VOC = 45.76 |
|---------------------------------------|

HAP Emissions

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

| |
|----------------------------|
| Combined HAP = 4.48 |
|----------------------------|

NOTE: Source has agreed to limit the throughput for Press #2 to 750 million square inches per 24 hour day (MMin²/24 hr).

Methodology

⁽¹⁾ Max. coverage for inks is the typical value for the number of color units, and max coverage for fountain solutions and press cleaners are typical max usages for these types of presses

⁽²⁾ VOC Content (wt%) is determined from the MSDS for the "worst case" product within the product type used on the identified press

⁽³⁾ Flash off % is determined from the EPA document "Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing" (EPA 453/R-06-002, September 2006)

⁽⁴⁾ VOC PTE from Inks, Fountain Solutions, and Press Cleaners (tpy) = Maximum Coverage x VOC Content (wt%) x Flash Off % x Throughput x 1 ton/2000 pounds

⁽⁵⁾ VOC PTE from Inks, Fountain Solutions, and Press Cleaners (tpy) = Maximum Coverage x VOC Content (wt%) x Flash Off % x Throughput x 1 ton/2000 pounds x Control Efficiency (99%)

⁽⁶⁾ Limited VOC Emissions = Limited Throughput x Maximum Coverage x VOC Content (wt%) x Flash Off % x 1 ton/2000 pounds

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

**Company Name: Mignone Communications, Inc., Division of EP Graphics,
Address City IN Zip: 880 East State Street, Huntington, Indiana 46750
FESOP Administrative Amendment: 069-33080-00059
Reviewer: Bruce Farrar
Date: August 12, 2008**

**Emission Unit ID: Press #3 Press Description: Heidelberg Heatset
Construction Date: 2004**

VOC Emissions from Inks and Coatings

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

VOC Emissions from Fountain Solution and Press Cleaning

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

| | | |
|--------------------|---------------|----------------------|
| Press #3 | Before | After Control |
| Total VOC = | 157.18 | 0.79 |

HAP Emissions

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

| | | |
|-----------------------|---------------|----------------------|
| Combined HAP = | Before | After Control |
| | 1.21 | 0.0060 |

Methodology

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

Appendix A: Emissions Calculations

**Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Mignone Communications, Inc., Division of EP Graphics,
Address City IN Zip: 880 East State Street, Huntington, Indiana 46750
FESOP Administrative Amendment: 069-33080-00059
Reviewer: Bruce Farrar

| Heat Input Capacity MMBtu/hr | HHV mmBtu mmscf | Potential Throughput MMCF/yr | Description |
|---------------------------------|-----------------------|---------------------------------|----------------------|
| 2.42 | | | Press #1 Drying Oven |
| 1.13 | | | Press #3 Drying Oven |
| 2.30 | | | RTO |
| 0.13 | | | Space Heater |
| 6.0 | 1020 | 51.4 | |

| Emission Factor in lb/MMCF | Pollutant | | | | | | |
|-------------------------------|-----------|-------|---------------|-----|--------------------|-----|-----|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 7.6 | 0.6 | 100 **see below | 5.5 | 84 |
| Potential Emission in tons/yr | 0.0 | 0.2 | 0.2 | 0.0 | 2.6 | 0.1 | 2.2 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 25

Methodology

All emission factors are based on normal conditions.
MMBtu = 1,000,000
MMCF = 1,000,000 Cubic Feet
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
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000

HAPS Calculations

| HAPs - Organics | | | | | | |
|-------------------------------|-----------|-----------------|--------------|-----------|-----------|------------------|
| Emission Factor in lb/MMCF | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene | Total - Organics |
| | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 | |
| Potential Emission in tons/yr | 5.393E-05 | 3.081E-05 | 1.926E-03 | 4.622E-02 | 8.731E-05 | 4.832E-02 |

| HAPs - Metals | | | | | | |
|-------------------------------|-----------|-----------|-----------|-----------|-----------|------------------|
| Emission Factor in lb/MMCF | Lead | Cadmium | Chromium | Manganese | Nickel | Total - Metals |
| | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 | |
| Potential Emission in tons/yr | 1.284E-05 | 2.825E-05 | 3.595E-05 | 9.758E-06 | 5.393E-05 | 1.407E-04 |

Total HAPs 4.846E-02
Worst HAP 4.622E-02

Methodology is the same as for PM and SO2.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Greenhouse Gas Calculations

| Greenhouse Gas | | | |
|---------------------------------------|---------|-----|-----|
| Emission Factor in lb/MMCF | CO2 | CH4 | N2O |
| | 120,000 | 2.3 | 2.2 |
| Potential Emission in tons/yr | 3,081 | 0.1 | 0.1 |
| Summed Potential Emissions in tons/yr | 3,082 | | |
| CO2e Total in tons/yr | 3,100 | | |

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low NOx burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (100)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
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: Mike Broom
Mignone Communications, Inc., Division of EP Graphics, Inc.
880 E State St
Huntington, IN 46750-2956

DATE: May 3, 2013

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

SUBJECT: Final Decision
FESOP - Administrative Amendment
069 - 33080 - 00059

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:
Tyler Kitt, President
Donald L Taylor Bruce Carter Associates
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

Mail Code 61-53

| | | | | |
|----------------------------|---|---|---|--|
| IDEM Staff | LPOGOST 5/3/2013 EP Graphics Inc. 069 - 33080 - 00059 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 | | Mike Broom EP Graphics Inc. 880 E State St Huntington IN 46750-2956 (Source CAATS) Via confirmed delivery | | | | | | | | | |
| 2 | | Tyler Kitt President EP Graphics Inc. 169 S Jefferson St Berne IN 46711 (RO CAATS) | | | | | | | | | |
| 3 | | Huntington Town Council and Mayors Office 300 Cherry St. Huntington IN 46750 (Local Official) | | | | | | | | | |
| 4 | | Huntington County Board of Commissioners 354 N. Jefferson St. Suite 201 Huntington IN 46750 (Local Official) | | | | | | | | | |
| 5 | | Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party) | | | | | | | | | |
| 6 | | Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party) | | | | | | | | | |
| 7 | | Huntington County Health Department 354 N. Jefferson Street, Suite 201 Huntington IN 46750 (Health Department) | | | | | | | | | |
| 8 | | Melvin & Deborah Gillespie 5616 N 200 E Huntington IN 46750 (Affected Party) | | | | | | | | | |
| 9 | | Donald L Taylor Bruce Carter Associates 616 S 4th Street Elkhart IN 46514 (Consultant) | | | | | | | | | |
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