Brad Halloran - Case No. 04-16; Packaging Supplemental Discovery Answers

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Date:	10/2/2012 5:44 PM	
Subject:	Case No. 04-16; Packaging Supplemental Discovery Answers	
CC:	"Brad Halloran (HALLORAB@ipcb.state.il.us)"	
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Attachments:	Document.pdf)

OCT 1 5 2012

Dear Chris and Nicole,

STATE OF ILLINOIS Pollution Control Board

Please find attached a copy of Packaging's Supplemental Responses to the State's Discovery, pursuant to the Hearing Officer's order dated September 25, 2012. Regards,

John A. Simon

Partner Drinker Biddle & Reath LLP 191 N. Wacker Dr. Suite 3700 Chicago IL 60606-1698 Telephone (312) 569-1392 Fax (312) 569-3392 john.simon@dbr.com

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

v.

PACKAGING PERSONIFIED, INC., an Illinois Corporation,

Respondent.

PCB 04-16

(Enforcement – Air)STATE OF ILLINOIS Pollution Control Board

RESPONDENT PACKAGING PERSONIFIED, INC.'S SUPPLEMENTAL ANSWERS TO COMPLAINANT'S INTERROGATORIES <u>AND REQUEST FOR THE PRODUCTION OF DOCUMENTS</u>

Respondent, Packaging Personified, Inc., by its attorneys, Drinker Biddle & Reath LLP, supplements its prior responses and objections to Complainant's Interrogatories and Request for Production as follows:

INTRODUCTORY STATEMENT

1. Documents, as described and subject to the objections below, will be available for inspection and copying at the offices of Packaging Personified, Inc., at a mutually convenient time agreed to by the parties.

<u>SUPPLEMENT</u>: Documents were made available to Complainant on August 23, 2012 at the Packaging facility and thereafter at the law office of Packaging's counsel. Additional documents will be made available at the Carol Stream facility.

2. Packaging Personified expressly reserves the right at any time to supplement or amend the answers provided herein, but Packaging Personified undertakes no obligation to do so beyond the requirements of 35 Illinois Administrative Code 101.616(h).

GENERAL OBJECTIONS

1. Packaging Personified objects to these Interrogatories and Document Requests because they are duplicative of Interrogatories and Document Requests already served on Packaging and to which Packaging already responded.

2. Packaging Personified objects to these Interrogatories and Document Requests because they vastly exceed the narrow scope of the factual issues relevant to the measurement of the economic benefit, if any, to Packaging which is the only evidentiary issue for the supplemental hearing in this matter.

3. Packaging Personified objects to these Interrogatories and Document Requests as they are inconsistent with or seek to impose requirements beyond the scope of the Illinois Code of Civil Procedure, the Illinois Supreme Court Rules, and Illinois Pollution Control Board regarding discovery.

4. Packaging Personified objects to these Interrogatories and Document Requests as they seek information that is protected from disclosure by privilege or other grounds for withholding information from discovery including, but not limited to, the attorney-client privilege, the work product doctrine or other privilege.

<u>SUPPLEMENT</u>: Packaging does not withhold any responsive document on the basis of attorney-client or attorney work product privilege.

 Packaging Personified objects to these Interrogatories and Document Requests as they seek information that is highly confidential, personal, proprietary, trade secrets, or otherwise commercially sensitive.

<u>SUPPLEMENT</u>: Packaging is only withholding tax returns that contain personal financial information pursuant to this objection.

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- 2 -

6. Packaging Personified objects to these Interrogatories and Document Requests as they are overly broad, vague, ambiguous, unduly burdensome, and not relevant or reasonably calculated to lead to the discovery of admissible evidence.

7. Packaging Personified objects to these Interrogatories and Document Requests as they seek documents and information equally available to the State of Illinois as to Packaging Personified.

8. Packaging Personified's responses to these Interrogatories and Document Requests are made without waiver and with the express reservation of:

- (a) all questions as to the competence, relevance, materiality and admissibility as evidence for any purpose of the information or documents, or the subject matter thereof, in any aspect of this or any other action, arbitration, proceeding or investigation;
- (b) the right to object on any ground to the use of any such documents or information, or the subject matter thereof, in any aspect of this or any other action, arbitration, proceeding or investigation;
- (c) the right to object at any time to a demand for any further response to this or any other interrogatories, request to admit or request for the production of documents.

9. Each of the following responses is made subject to and without waiver of the foregoing General Objections.

ANSWERS TO INTERROGATORIES

Interrogatory No. 1

Please identify each and every fact witness who may be called by Respondent as a witness in any hearing in this matter, and state his or her area of knowledge.

- 3 -

ANSWER: Dominic Imburgia and Joseph Imburgia have knowledge of the business of Packaging Personified during the 1995-2004 time period relevant to the supplemental hearing.

SUPPLEMENTAL ANSWER: Dominic Imburgia and Joseph Imburgia will testify that Press #5 had capacity to print all the production of Press #4 and #5 for the years 1995-2002 and that Press #5 did print all the production in 2003. Further, they will testify that Packaging actually realized an economic savings as a result of shutting down Press #4 and shifting all the production to Press #5 in 2002-2003.

Interrogatory No. 2

Please identify each and every opinion witness who may be called by Respondent as a witness at any hearing in this matter, and state:

a) his or her area of knowledge;

b) the subject matter on which the opinion witness will testify;

c) the conclusions and opinions of the opinion witness and the bases therefore;

d) the qualifications of the opinion witness;

ANSWER: Richard Trzupek and Chris McClure. Packaging will supplement its response to this Interrogatory on August 9, 2012 per the July 3, 2012 Scheduling Order.

SUPPLEMENTAL ANSWER: Please see the August 9, 2012 expert report of Richard

Trzupek and Chris McClure.

Interrogatory No. 3

For each month from January 1, 1995 through December 31, 2002, identify the quantity of substrate printed on Press No. 4.

ANSWER: Packaging does not have production records for the period covered by this Interrogatory. Pursuant to Illinois Supreme Court Rule 213(e), responsive information may be

- 4 -

found in Packaging records reflecting annual costs for materials used in production and annual sales figures, which are available for review and copying.

SUPPLEMENTAL ANSWER: Utilizing Respondent's Exhibits 12, 13 and 49 from the June 2009 Hearing in this matter, Packaging is able to recreate data responsive to this Interrogatory based upon the stated assumptions which are presented it in the spreadsheet attached hereto as Exhibit A.

Interrogatory No. 4

For each month from January 1, 1995 through December February 1, 2004, identify the quantity of substrate printed on Press No. 5.

ANSWER: Packaging does not have production records for the period covered by this Interrogatory. Pursuant to Illinois Supreme Court Rule 213(e), responsive information may be found in Packaging records reflecting annual costs for materials used in production and annual sales figures, which are available for review and copying.

SUPPLEMENTAL ANSWER: : Utilizing Respondent's Exhibits 12, 13 and 49 from the June 2009 Hearing in this matter, Packaging is able to recreate data responsive to this Interrogatory based upon the stated assumptions which are presented it in the spreadsheet attached hereto as Exhibit A.

Interrogatory No. 5

For each month from January 1, 1995 through December 31, 2002, identify the volume, VOM content, and name of each printing ink used on Press No. 4.

ANSWER: Packaging does not have the ink purchasing records for the period covered by this interrogatory. Packaging continues to use the same inks it used during the time period covered by this interrogatory. The VOM content of these same inks has varied little, if at all. The volume of ink Packaging used in the years covered by this Interrogatory was, however, much lower, particularly in the earlier years when its volume of business was much lower. **SUPPLEMENTAL ANSWER:** Utilizing Respondent's Exhibits 12, 13 and 49 from the June 2009 Hearing in this matter, Packaging is able to recreate data responsive to this Interrogatory based upon the stated assumptions which are presented it in the spreadsheet attached hereto as Exhibit A.

Interrogatory No. 6

For each month from March 1, 1995 through February 1, 2004, identify the volume, VOM content, and name of each printing ink used on Press No. 5.

ANSWER: Packaging does not have the ink purchasing records for the period covered by this interrogatory. Packaging continues to use the same inks it used during the time period covered by this interrogatory. The VOM content of these same inks has varied little, if at all. The volume of ink Packaging used in the years covered by this Interrogatory was, however, much lower, particularly in the earlier years when its volume of business was much lower.

SUPPLEMENTAL ANSWER: Utilizing Respondent's Exhibits 12, 13 and 49 from the June 2009 Hearing in this matter, Packaging is able to recreate data responsive to this Interrogatory based upon the stated assumptions which are presented it in the spreadsheet attached hereto as Exhibit A

Interrogatory No. 7

Identify each employee who worked for Respondent from March 15, 1995 through February 1, 2004, and state:

- a. The responsibilities of the employee;
- b. The shift to which the employee was assigned;
- c. Starting and ending dates of employment for the employee; and
- b. Total compensation paid to the employee, including hourly rate or salary, benefits, overtime, and government required employee payments such as unemployment and workers compensation cost.

ANSWER: Packaging objects to this Interrogatory. Packaging actually saved money on personnel when it shut down Press #4 in 2002 and shifted production to Press #5. Nevertheless, Packaging is not seeking to offset any economic benefit with a claim of cost savings by virtue of compliance. Thus, information responsive to this Interrogatory could have no possible relevance to the measure of economic benefit, if any, at issue in the supplemental hearing.

Interrogatory No. 8

Identify each printing job run on Press No. 4 during the period March 15, 1995 through December 31, 2002, and state:

- a. the date the order was received from the printing customer;
- b. the date delivery of the job was promised;
- c. the date the finished job was delivered to the printing customer;
- d. the dollar value of the labor required to complete the printing order;
- e. the gross revenue realized by Packaging Personified Inc. from the printing job;
- f. the net profit realized by Packaging Personified, Inc. from the printing job.

ANSWER: Packaging does not have production records for the period covered by this

Interrogatory. Pursuant to Illinois Supreme Court Rule 213(e), responsive information may be

found in Packaging records reflecting annual costs for materials used in production and annual

sales figures, which are available for review and copying.

Interrogatory No. 9

Identify each printing job run on Press No. 5 during the period March 15, 1995 through February 1, 2004, and state:

- a. the date the order was received from the printing customer;
- b. the date delivery of the job was promised;
- c. the date the finished job was delivered to the printing customer
- d. the dollar value of the labor required to complete the printing order.
- e. the gross revenue realized by Packaging Personified Inc. from the printing job.
- f. the net profit realized by Packaging Personified, Inc. from the printing job.

ANSWER: Packaging does not have production records for the period covered by this

Interrogatory. Pursuant to Illinois Supreme Court Rule 213(e), responsive information may be

found in Packaging records reflecting annual costs for materials used in production and annual sales figures, which are available for review and copying.

Interrogatory No. 10

Describe the procedures required to switch Presses 4 and 5 from one printing job to another, and state the amount of time required for such a changeover.

ANSWER: It took no time to change over production from Press #4 to Press #5. Set up time on Press #5 was much shorter than set up time on Press #4. Press #5 printed approximately 30% faster than Press #4.

SUPPLEMENTAL ANSWER: Press #4 ran film at approximately 450 feet per minute.

Press No. 5 ran film at approximately 750 feet per minute. Set-up on Press #4 was about one hour per color, so a six color job took about six hours set-up time. Set-up on Press #5 was about 30-35 minutes a color, so a six color job took about three or three and a half hours to set up. If Press #4 ran 10 million impressions in a month, Press #5 ran 20 million impressions a month, or about double the production of Press #4. Daily start up and shut down was obviated on Press #5 in December 2002-2003 when Press #5 was operated continuously over three shifts after Press #4 was shut down.

Interrogatory No. 11

Identify all persons, including vendors, contractors, employees or agents involved with or responsible for the maintenance and repair of Presses No. 4 and 5 from March 15, 1995 through February 9, 2004.

ANSWER: Gary Peletier with a last known telephone number (630) 918-1038

Interrogatory No. 12

For each month from March 15, 1995 through December 31, 2002, state the number of hours that Press No. 4 operated.

ANSWER: Packaging does not have production records for the period covered by this Interrogatory. Pursuant to Illinois Supreme Court Rule 213(e), responsive information may be

found in Packaging records reflecting annual costs for materials used in production and annual sales figures, which are available for review and copying.

SUPPLEMENTAL ANSWER: Utilizing Respondent's Exhibits 12, 13 and 49 from the June 2009 Hearing in this matter, Packaging is able to recreate data responsive to this Interrogatory based upon the stated assumptions which are presented it in the spreadsheet attached hereto as Exhibit A.

Interrogatory No. 13

For each month from March 15, 1995 through February 9, 2004, state the number of hours that Press No. 5 operated.

ANSWER: Packaging does not have production records for the period covered by this Interrogatory. Pursuant to Illinois Supreme Court Rule 213(e), responsive information may be found in Packaging records reflecting annual costs for materials used in production and annual sales figures, which are available for review and copying.

SUPPLEMENTAL ANSWER: Utilizing Respondent's Exhibits 12, 13 and 49 from the June 2009 Hearing in this matter, Packaging is able to recreate data responsive to this Interrogatory based upon the stated assumptions which are presented it in the spreadsheet attached hereto as Exhibit A.

Interrogatory No. 14

Identify each modification, upgrade, or repair made to Press No. 5 between March 15, 1995 and February 9, 2004

ANSWER: There were no modifications, upgrades or major repairs to Press #5 during this time period.

Interrogatory No. 15

With regard to Packaging Personified Inc, for each year from 1995 through 2004, please identify:

-9-

- a. Each owner of the company, and the share of ownership held;
- b. The total compensation received by each owner of the company for each year from 1995 through 2004; and
- c. Whether the company was classified by the Internal Revenue Service as a subchapter C or subchapter S corporation for the relevant tax year.

ANSWER: a. Dominic Imburgia 70%; Phylis Muccianti 30%.

- b. Objection to the relevance of this confidential personal information.
- c. Subchapter C (1995-1999); Subchapter S (2000-2004).

Interrogatory No. 16

State each fact that supports Packaging Personified Inc.'s claim that the "tunnel dryer" system on Press No. 5 constitutes a VOM capture and control device.

ANSWER: These facts are included in the Expert Report and Testimony of Richard

Trzupek at the hearing in this matter and will be supplemented by his Supplemental Report on

August 9, 2012. Further answering pursuant to Supreme Court Rule 213(e), responsive

information may be gathered from the documents produced by Packaging.

RESPONSES TO FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

1. All documents relating to the purchase and operation of Press No. 4, including sales and promotional materials provided by the Press manufacturer or supplier, blueprints and other technical drawings, maintenance records, diagrams, and operating logs.

ANSWER: Packaging does not have operating logs or maintenance records for Press #4

for the relevant 1995-2004 time period. Press #4 manufacturer materials in the possession of

Packaging are available for inspection and copying.

SUPPLEMENTAL ANSWER: Packaging has no documents responsive to Request

No. 1.

2. All documents relating to maintenance, modification, or repair of Press No. 4 from the date of installation through December 31, 2002.

ANSWER: Packaging does not have any responsive documents.

3. Daily operating logs or records for Press No. 4 from March 15, 1995 through December 31, 2002.

ANSWER: Packaging does not have documents responsive to this Request.

4. All documents relating to Press No. 5, including sales and promotional materials provided by the Press manufacturer or supplier, blueprints and other technical drawings, maintenance records, diagrams, and operating logs.

ANSWER: Packaging does not have operating logs or maintenance records for Press #5

for the relevant 1995-2004 time period. Press #5 manufacturer materials in the possession of

Packaging are available for inspection and copying.

SUPPLEMENTAL ANSWER: Packaging has already produced the January 1995

Purchase Invoice for Press #5 and the operations and maintenance manual for Press #5.

Packaging has no other responsive documents.

5. All documents relating to maintenance, modification, or repair of Press No. 5 from the date of its installation thorough its 2004 connection to the RCO control device.

ANSWER: Packaging does not have records responsive to this Request.

6. Daily operating logs and records for Press No. 5 from March 15, 1995 through February 9, 2004.

ANSWER: Packaging does not have records responsive to this Request.

7. All documents relating to Packaging Personified, Inc.'s business relationship with Huff & Huff Incorporated, including letters, reports, electronic correspondence, invoices and checks.

ANSWER: Records responsive to this Request in Packaging's possession and control

are available for review and copying.

SUPPLEMENTAL ANSWER: Packaging produced all documents responsive to this

Request to Complainant on August 23, 2012.

8. All documents relating to Packaging Personified, Inc.'s business relationship with Mostardi Platt Environmental, including letters, reports, electronic correspondence, invoices and checks.

ANSWER: Records responsive to this Request in Packaging's possession and control are available for review and copying.

SUPPLEMENTAL ANSWER: Packaging produced all documents responsive to this Request to Complainant on August 23, 2012.

9. All documents not produced in response to Requests 5 and 6 above, relating to Packaging Personified, Inc.'s business relationship with Richard Trzupek, including letters, reports, electronic correspondence, invoices and checks.

ANSWER: Packaging has no records responsive for this Request.

10. Packaging Personified, Inc.'s federal tax returns, including all schedules, for the years 1995 through 2004.

ANSWER: Packaging objects to this Request based upon the lack of relevance of its federal tax returns to the matter at issue in the supplemental hearing.

SUPPLEMENTAL ANSWER: Packaging will produce certifications of its gross sales for each of the years requested prepared by its accountants.

11. All documents referencing or relating to the "tunnel dryer" system on Press No. 5.

ANSWER: Documents responsive to this Request in the possession and control of Packaging are available for review and copying.

SUPPLEMENTAL ANSWER: Packaging produced the January 1995 Purchase Invoice and the operations and maintenance manual to Complainant on August 23, 2012 and September 4, 2012, respectively. Packaging produced the Expert Report of Richard Trzupek on August 9, 2012 which incorporates his prior reports. Packaging has no other documents

responsive this Request.

Dated: July 30, 2012 Date Supplemented: October 2, 2012 Respectfully submitted,

PACKAGING PERSONIFIED, INC.

BY: One of Its Attorneys

Roy M. Harsch, Esq. John A. Simon, Esq. Drinker Biddle & Reath LLP 191 N. Wacker Drive, Suite 3700 Chicago, Illinois 60606-1698 (312) 569-1000

VERIFICATION

Pursuant to Illinois Supreme Court Rule 213 and 214, and under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that he has read the foregoing Respondent Packaging Personified, Inc.'s Supplemental Answers to Complainant's Interrogatories and Request for the Production of Documents; and that, subject to the objections interposed by counsel, the responses given therein are true, correct, and complete, to the best of his knowledge, information and belief.

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Respondent Packaging Personified, Inc.'s Supplemental Answers to Complainant's Interrogatories and Request for the Production of Documents was served upon the parties below by electronic mail and U.S. First Class Mail on October 2, 2012:

> L. Nichole Cunningham Assistant Attorney General Environmental Bureau 69 West Washington Street, 18th Floor Chicago, Illinois 60602 Icunningham@atg.state.il.us

> Christopher J. Grant Assistant Attorney General Environmental Bureau 69 West Washington Street, 18th Floor Chicago, Illinois 60602 cgrant@atg.state.il.us

John A. Simon

CLERK'S OFFICE

STATE OF ILLINOIS Pollution Control Board

10	AD 800-631	-6989
	A	EXHIBIT

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			Calender Vear 199	1997				
Production Pounds for Carol Stream Press Dept Offline presses only	All Presses	Pla			P 85 5			
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Pounds above are calculated based upon the VOM data for the years with known pounds produced and known VOM volumes	The assumptions that were made to recreate this data are as follows	e made to rec	reate this data are as follo	WS				
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·	2 : Footage produced was converted based upon an average value of 20# per 1000 feet of material (this value was compared to years where both footage and pound information was available	converted b <i>a</i> value was co aliable	ased upon an average valu mpared to years where bot	∍ of 20# per h footage and	•			
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	6 : Press 5 produced at a run rate of approximately 750 FPM and estimated hours are calclated based upon that	un rate of ap upon that	proximately 750 FPM and e	stimated				
VOC P	VOC Reporting to Edwin C. Bakowski IEPA provided through Mostardi Platt May 13th 2009 FESOP Application request for additional information ID No:043020ACJ	owski IEPA dditional infr	provided through Mostar ormation ID No:043020A	di Platt May 13 CJ	th 2009			
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Grand Total	A SAME	A WASS APress 4 Street 1 6		Tressift of the Tressift of th	FEO						Pounds above are calculated based upon the VOM data for the years with known pounds produced and known VOM volumes	2,259,32803	and a set of the set o	Production Pounds for Carol Stream Press Dept Offline presses only	
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1110	07.6 27 0,66601, A.	VOC Reporting to Edwin C. Bakowski IEPA provided through Mostardi Platt May 13th 2009 FESOP Application request for additional information ID No.043020ACJ	6 : Press 5 produced at a run rate of approximately 750 FPM and estimated hours are calcilated based upon that	5 : Press 5 produced approximately 65% of the produced footage at an average of 5 colors run per job consuming 60% more ink per 1000 feet produced	 Press 4 produced approximately 35% of the produced footage at an average of 3 colors run per job consuming 40% less ink per 1000 feet produced Press 4 produced at a run rate of approximately 450 FPM and estimated hours are calclated based upon that 	2 : Footage produced was converted based upon an average value of 20# per 1000 feet of material (this value was compared to years where both footage and pound information was available	1 : Average pounds of substrate per pound of VOM based upon comparison of known pounds produced from 2000-2003 compared to previously calculated VOM emissions is 60.8	The assumptions that were made to recreate this data are as follows	A17,420.00			Calender Year
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FESC	Pounds above are based upon summary data still available in our data history and accepted as accurate	3,847,780	219,297	293,974	411,493	378.747	323,143	302,430	341,927	393,663	329,448	272 002	297 224	2000 pounds of substrate	Offline presses only	Production Pounds for Carol Stream Press Dept	
 4 : Press 4 produced at a run rate of approximately 450 FPM and estimated hours are calclated based upon that 5 : Press 5 produced approximately 65% of the produced footage at an average of 5 colors run per job consuming 60% more ink per 1000 feet produced 6 : Press 5 produced at a run rate of approximately 750 FPM and estimated hours are calclated based upon that VOC Reporting to Edwin C. Bakowski IEPA provided through Mostardi FESOP Application request for additional information 1D No:043020ACJ 	The assumptions that were made to recreate this data are as follo 1 : Footage produced was converted based upon an average value of 20# per 1000 feet of material (this value was compared to years where both footage and pound information was available 2 : Press 4 produced approximately 35% of the produced footage an average of 3 colors run per job consuming 40% less lnk per 10 feet produced	192,389,000	10,964,850	14,698,700	20,574,650	18,937,350	16,157,150	15,121,500	17,096,350	19,683,150	16,472,400	13.600.100	14.861.200	Estimated Footage	All Presses		
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un rate of ap ted based up oximately 65° per job cons un rate of ap ted based up ted based up ted based up	a made to rec converted be rerial (this val nund informately 35° per job cons	2,494)	142.14	190.54	268.71	245.48	209.44	196.02	221.62	255,15	213.53	176.30	192.65	Estimated	Pross 4		Cale
proximately / ion that % of the prod uming 60% r proximately ; provided th provided th	reate this da issed upon an une was comp thon was avai thon was avai whe prod	18,680,%	1,065	1,427	1,998	1,839	1,569	1,468	1,660	1,911	1,599	1.321	1.443	otal.V0///in			Calender Vear 2000
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i Platt May 13		2,779	158.38	212.31	297.19	273.54	233.38	218.42	248.95	284.31	237.93	196.45	214.66	VE stimated	Rices Size		
ith 2009		43,560	2,483	3,328	4,658	4,288	3,658	3,424	3,871	4,457	3,730	3.079	3.365	Estimated Tota (VOM)			

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	Pounds above are based upon summary data still avallable in our data history and accepted as accurate	361,312 4,500,325	296,024	388,883	329,620	397,472	454 074	454,040	463,077	371,488	279,999	224,200	2001- boulinds of substrate	Production Pounds for Carol Stream Press Dept Offline presses only	
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7 7 .		3,250	213.80	280.86	238.06	287.06	335.16	330 54	334.44	268.30	202.22	161.92	Estimated	Eress 5	
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VOC Reporting to Edwin C. Bakowski IEPA provided through Mostardi Platt May 13th 2009 FESOP Application request for additional information ID No:043020ACJ

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500.856	25.042.800	8,764,980	292.17	1,590,70	16,277,820	361.73	4,935	
400,054	20,002,700	7,000,945	233.36	1,270.56	13,001,755	288.93	3,942	
506,322	25,316,100	8,880,635	295.35	1,608.06	16,455,465	365.68	4,989	
438,780	21,939,000	7,678,650	255.96	1,393.55	14,260,350	316.90	4,324	
425.326	21,266,300	7,443,205	248.11	1,350.82	13,823,095	307.18	4,191	
490,796	24,539,800	8,588,930	286.30	1,558.75	15,950,870	354.46	4,836	
569,988	28,499,300	9,974,755	332.49	1,810.25	18,524,545	411.68	5,617	
334,589	16,729,450	5,855,308	195.18	1,062.64	10,874,143	241.65	3,287	
314.275	15,713,750	5,499,813	183.33	998.13	10,213,938	226.98	3,097	
478,546	23,927,300	0	0.00	0.00	23,927,300	531.72	7,255	
5,340,066	267,003,300	85,076,600	2,836	15,440.00		4,043	55,160,00	
Pounds above are based upon summary data still available in our data history and accepted as accurate	The assumptions that were made to recreate this data are as follows	ons that wer	e made to re	create this d	ata are as	·		
	1 : Footage produced was converted based upon an average v of 20# per 1000 feet of material (this value was compared to ye where both footage and pound information was available 2 : Press 4 produced approximately 35% of the produced foota an average of 3 colors run per job consuming 40% less ink per 1000 feet produced	oduced was 10 feet of ma otage and p oduced appr 3 colors run Juced	converted b terial (this v ound inform oximately 35 i per job con	based upon a alue was con ation was av 3% of the pro isuming 40%	1 : Footage produced was converted based upon an average value of 20# per 1000 feet of material (this value was compared to years where both footage and pound information was available 2 : Press 4 produced approximately 35% of the produced footage at an average of 3 colors run per job consuming 40% less ink per 1000 feet produced			
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	6 : Press 5 produced at a run rate of approximately 750 FPM and estimated hours are calciated based upon that	oduced at a i irs are calcli	run rate of a ated based u	pproximately ipon that	750 FPM and			
Ś	VOC Reporting to Edwin C. Bakowski IEPA provided through Mostardi Platt May 13th 2009	lwin C. Bak	owski IFPA	nrovided th	rounh Mostardi	Platt May 13t	0009	
	FESOP Application request for additional information ID No:043020ACJ	equest for a	additional in	formation IE) No:043020AC			
「「「	and a second	1997-44	100	3666P	Real of the	E822001	2002	65年)2003 、4996
	+	3.49	0.58	2.70	1.67	3.37	0.49	1.23
	- 	5.09	5.57	8.71	9.34	12.18	7.72	0.00
		11.89	13.01	20,34	21.78	28.42	27.58	59.84
Grand Total	20,72 15.31	16.98	19,16	29,05 ···	32.79	40:50	35,79	50 19 59 66
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		Press # 334 1995	VOC FESO						Pounds above are based upon summary data still available in our data history and accepted as accurate	6;024;683	600'86E	470,097	538,688	616,558	423,349	457,928	548,821	636,383	551-534	substrate produced //	2003 pounds of	presses only	for Carol Stream Press Dept Offline	Production Pounds		
4.59	4.06	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	Reporting to Ec P Application I	estimated ho	6 : Press 5 pr	5 : Press 5 produced approximately 65% of the produced footag an average of 5 colors run per job consuming 60% more ink per 1000 feet produced	4 : Press 4 produced at a run rate of approximately 450 FPM and estimated hours are calclated based upon that	1 : Footage produced was converted based upon an average v of 20# per 1000 feat of material (this value was compared to ye where both footage and pound Information was available 2 : Press 4 produced approximately 35% of the produced foota an average of 3 colors run per job consuming 40% less ink per 1000 feet produced	The assumptions that were made to recreate this data are as follows	301,234,150	19,900,450	21,638,200	26,934,400	30,827,900	21,167,450	22,896,400	27,441,050	31,819,150	27,576,700	Footage	Estimated	All Bresses				ward and the laws of a root and
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8,71	2.70	1999	provided the ormation ID	pon that	proximately	% of the proc suming 60%	proximately pon that	ased upon ar ilue was com ation was ave % of the proc suming 40% i	create this d	0:00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	Bounder	Estimateda Iotal VOM In		oved out of		Galeñdei: Ye	and a subscription of the
9.34	1.67	一成加42000家分	VOC Reporting to Edwin C. Bakowski IEPA provided through Mostardi Platt May 13th 2009 FESOP Application request for additional information ID No:043020ACJ		750 FPM and	5 : Press 5 produced approximately 65% of the produced footage at an average of 5 colors run per job consuming 60% more ink per 1000 feet produced	450 FPM and	1 : Footage produced was converted based upon an average value of 2.0# per 1000 feat of material (this value was compared to years where both footage and pound information was available 2 : Press 4 produced approximately 35% of the produced footage at an average of 3 colors run per job consuming 40% less ink per 1000 feet produced	ata are as	301/234/150	19,900,450	21.638.200	28,934,400	30,827,900	21,167,450	20.088.100	27,441,050	31,819,150	27,576,700	footage	Estimated				rear 2003	THE REPORT OF THE PARTY OF THE
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7.72	0.49	¥. 2002	th 2009							119,680.00	7.906	8,597	10,701	12,248	8,410	7.973	10,902	12,642	10,956	D Poundsto	Estimated Trotal VOMIN					
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Total without 182 20.72 Grand Total 24.70 10.72 (15.31 (19.37 11.89 16,98 20,47 13.01 18,58 19,16 20.34 29.05 31,75 21.78 31.12 32.79 40.60 43.97 27.58 35.30 35.79 59.84 59.84 61.07