

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

From: "Simon, John A." <John.Simon@dbr.com>
To: "Grant, Christopher J. (CGrant@atg.state.il.us)" <CGrant@atg.state.il.us>, "Cunningham, Lorren (lcunningham@atg.state.il.us)" <lcunningham@atg.state.il.us>
Date: 10/2/2012 5:44 PM
Subject: Case No. 04-16; Packaging Supplemental Discovery Answers
CC: "Brad Halloran (HALLORAB@ipcb.state.il.us)" <HALLORAB@ipcb.state.il.us>, "Harsch, Roy M." <Roy.Harsch@dbr.com>
Attachments: Document.pdf

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OCT 15 2012

STATE OF ILLINOIS
Pollution Control Board

Dear Chris and Nicole,

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

2012 OCT 15 10:51 AM
STATE OF ILLINOIS
POLLUTION CONTROL BOARD

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
)
Complainant,)
)
v.)
)
PACKAGING PERSONIFIED, INC., an)
Illinois Corporation,)
)
Respondent.)

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OCT 15 2012
STATE OF ILLINOIS
Pollution Control Board

PCB 04-16
(Enforcement - Air)

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

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.

SUPPLEMENT: 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.

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

5. 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.

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

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.

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 Trzupsek 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 Trzupsek 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

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:

- 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 Trzupsek 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 through 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 Trzupsek, 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 Trzupsek 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:

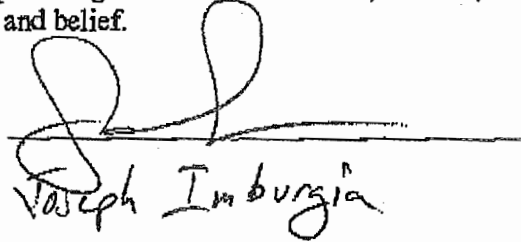


One of Its Attorneys

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.



Joseph Imburgia

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:

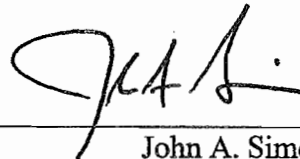
L. Nichole Cunningham
Assistant Attorney General
Environmental Bureau
69 West Washington Street, 18th Floor
Chicago, Illinois 60602
lcunningham@atg.state.il.us

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

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STATE OF ILLINOIS
Pollution Control Board



John A. Simon

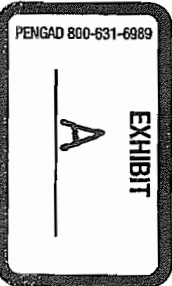
VOC Reporting to Edwin C. Bakowski IEPA provided through Mostardi Platt May 13th 2009
 FESOP Application request for additional information ID No:043020ACJ

Press #	1995	1996	1997	1998	1999	2000	2001	2002	2003
Press 1182	3.98	4.06	3.49	0.58	2.70	1.67	3.37	0.49	1.23
Press 4	6.22	4.59	5.09	5.57	8.71	9.34	12.18	7.72	0.00
Press 5	14.50	10.72	11.89	13.01	20.34	21.78	28.42	27.58	59.84
Total without 182	20.72	15.31	16.98	18.58	29.05	31.12	40.60	35.30	59.84
Grand Total	24.70	19.37	20.47	19.16	31.75	32.79	43.97	35.79	61.07

Produced on Press 5 only

Production Pounds for Carol Stream Press Dept Offline presses only

2000	2001	2002	2003
297,224	224,200	500,856	549,190
272,002	279,999	400,054	551,534
329,448	371,488	506,322	696,383
393,663	463,077	438,780	548,821
341,927	454,040	600,566	457,928
302,430	470,136	425,326	401,362
323,143	464,074	490,796	423,349
284,432	397,472	569,986	616,558
378,747	329,620	334,589	538,688
411,493	388,883	314,275	470,097
293,974	296,024	279,870	432,764
219,297	361,312	478,546	398,009
3,847,780	4,500,325	5,340,066	6,024,683
61,882	55,922	75,642	60,811



Production Pounds for
Carol Stream Press Dept
Offline presses only

1995 estimated pounds of substrate produced	2,519,552
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Pounds above are calculated based upon the VOM data for the years with known pounds produced and known VOM volumes

		Calendar Year 1995						
		Press 4			Press 5			
All Presses								
Total Estimated Footage	12,619,776.00	44,092,160	1,653	Total VOM in Pounds as originally calculated from previously available data	12,440.00	Estimated Footage	Estimated hours	Total VOM in Pounds as originally calculated from previously available data
						81,885,440	1,820	29,000.00

Average pounds of substrate per pound of VOM based upon comparison of known pounds produced from 2000-2003 compared to previously calculated VOM emissions	60.80
--	-------

The assumptions that were made to recreate this data are as follows

- 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
- 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)
- 3 : 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
- 4 : Press 4 produced at a run rate of approximately 450 FPM and estimated hours are calculated 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 calculated based upon that

VOC Reporting to Edwin C. Bakowski IEPA provided through Mostardi Platt May 13th 2009
FESOP Application request for additional information ID No:043020ACJ

	1995	1996	1997	1998	1999	2000	2001	2002
Press 1 & 2	3.98	4.06	3.49	0.58	2.70	1.67	3.37	0.49
Press 4	6.22	4.59	5.09	5.57	8.71	9.34	12.18	7.72
Press 5	14.50	10.72	11.89	13.01	20.34	21.78	28.42	27.58
Total without 1 & 2	20.72	15.31	16.98	18.58	29.05	31.12	40.60	35.30
Grand Total	24.70	19.97	20.47	19.16	31.75	32.79	43.97	35.79

Production Pounds for
Carol Stream Press Dept
Offline presses only

1996 estimated pounds of substrate produced	1961.095
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Pounds above are calculated based upon the VOM data for the years with known pounds produced and known VOM volumes

Calendar Year 1996					
All Presses	Press 1	Press 2	Press 3	Press 4	Press 5
Estimated Footage	Estimated Footage	Estimated Footage	Estimated Footage	Estimated Footage	Estimated Footage
93,024.800	32,579.690	1,207	9,140.000	60,505.120	1,345
Total VOM in pounds as originally calculated from previously available data	Total VOM in pounds as originally calculated from previously available data				
60,505.120	21,440.000				

The assumptions that were made to recreate this data are as follows

- 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
- 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)
- 3 : 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
- 4 : Press 4 produced at a run rate of approximately 450 FPM and estimated hours are calculated 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 calculated based upon that

VOC Reporting to Edwin C. Bakowski | EPA provided through Mostardi Plat May 13th 2009
FESOP Application request for additional information ID No:043020ACJ

Press #	1996	1997	1998	1999	2000	2001	2002	2003
Press 1	3.98	4.06	3.49	0.58	2.70	1.67	3.37	1.23
Press 2	6.22	4.59	5.09	5.57	8.71	9.34	12.18	0.00
Press 3	14.50	10.72	11.89	13.01	20.34	21.78	27.58	59.84
Total without 1&2	20.72	15.31	16.98	18.58	29.05	31.12	40.60	59.84
Grand Total	24.70	19.37	20.47	19.16	31.75	32.73	43.97	61.07

Average pounds of substrate per pound of VOM based upon comparison of known pounds produced from 2000-2003 compared to previously calculated VOM emissions	60.80
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Production Pounds for Carol Stream Press Dept Offline presses only

1997 Estimated pounds of substrate produced	2,064,769
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Pounds above are calculated based upon the VOM data for the years with known pounds produced and known VOM volumes

Calendar Year 1997						
All Presses	Press 1	Press 2	Press 3	Press 4	Press 5	Press 6
Total Estimated Footage	103,238,400	36,132,440	1,338	10,180,000	67,104,960	1,491
Total VOM Pounds originally calculated	103,238,400	36,132,440	1,338	10,180,000	67,104,960	1,491
Total VOM Pounds originally calculated from previous years						
Total VOM Pounds available for data						
Average pounds of substrate per pound of VOM based upon comparison of known pounds produced from 2000-2003 compared to previously calculated VOM emissions						
						60.80

The assumptions that were made to recreate this data are as follows

- 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
- 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)
- 3 : 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
- 4 : Press 4 produced at a run rate of approximately 450 FPM and estimated hours are calculated based upon that
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- 6 : Press 5 produced at a run rate of approximately 750 FPM and estimated hours are calculated based upon that

VOC Reporting to Edwin C. Bakowski IEPA provided through Mostardi Platt May 13th 2009
FESOP Application request for additional information ID No:043020ACJ

Press #	1997	1997	1997	2000	2001	2002	2003
Press 1 & 2	3.98	4.06	3.49	0.58	2.70	1.67	3.37
Press 3	6.22	4.59	5.09	5.57	8.71	9.34	12.18
Press 5	14.50	10.72	11.89	13.01	20.34	21.78	28.42
Total without 1 & 2	20.72	15.31	16.98	18.58	29.05	31.12	40.60
Grand Total	24.70	19.37	20.47	19.16	31.75	32.79	43.97

Production Pounds for
Carol Stream Press Dept
Offline presses only

398 estimated pounds of
substrate produced
2,259,328

Calendar Year 1998						
All presses		Press 4		Press 5		
Total Estimated Footage	Estimated Footage	Estimated Footage	Total VOM pounds originally calculated from previously available data	Estimated Footage	Estimated Footage	Total VOM pounds originally calculated from previously available data
112968.003	39538.240	1464	14140.00	79428.160	1632	26020.00

Average pounds of substrate per
pound of VOM based upon
comparison of known pounds
produced from 2000-2003
compared to previously calculated
VOM emissions
60.8

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

- 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
- 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)
- 3 : 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
- 4 : Press 4 produced at a run rate of approximately 450 FPM and estimated hours are calculated 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 calculated based upon that

VOC Reporting to Edwin C. Bakowski | EPA provided through Mostardl Platt May 13th 2009
FESOP Application request for additional information ID No:043020ACJ

	1996	1997	1998	1999	2000	2001	2002	2003
Press #	1996	1997	1998	1999	2000	2001	2002	2003
Press 4	3.98	4.06	3.49	0.58	2.70	1.67	3.37	1.23
Press 5	6.22	4.59	5.09	5.57	8.71	9.34	12.18	0.00
Total without 1&2	14.50	10.72	11.89	13.01	20.34	21.78	28.42	59.84
Total without 1&2	20.72	15.31	16.98	18.58	28.05	31.12	40.60	59.84
Grand Total	24.70	19.37	20.47	18.16	31.72	32.79	43.97	61.07

Production Pounds for Carol Stream Press Dept Offline presses only

1999 estimated pounds of substrate produced	3,532,480
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Pounds above are calculated based upon the VOM data for the years with known pounds produced and known VOM volumes

Calendar Year 1999						
All Presses	Press 4	Press 5	Press 6	Press 7	Press 8	
Total Estimated Footage	61,818,400	2,290	17,420,000	14,805,600	2,151	40,680,000
Estimated Footage	61,818,400	2,290	17,420,000	14,805,600	2,151	40,680,000
Estimated hours	61,818,400	2,290	17,420,000	14,805,600	2,151	40,680,000
Total VOM in Pounds as originally calculated from previously available data	61,818,400	2,290	17,420,000	14,805,600	2,151	40,680,000
Total VOM in Pounds as originally calculated from previously available data	61,818,400	2,290	17,420,000	14,805,600	2,151	40,680,000

Average pounds of substrate per pound of VOM based upon comparison of known pounds produced from 2000-2003 compared to previously calculated VOM emissions	60.80
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The assumptions that were made to recreate this data are as follows

- 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
- 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)
- 3 : 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
- 4 : Press 4 produced at a run rate of approximately 450 FPM and estimated hours are calculated 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 calculated based upon that

VOC Reporting to Edwin C. Bakowski I EPA provided through Mostard Platt May 13th 2009
 FESOP Application request for additional information ID No:043020ACJ

	1995	1996	1997	1998	1999	2000	2001	2002	2003
Press 1	3.98	4.06	3.49	0.58	2.70	1.67	3.37	0.49	1.23
Press 2	6.22	4.59	5.09	5.57	8.71	9.34	12.18	7.72	0.00
Press 3	14.50	10.72	11.89	13.01	20.34	21.78	28.42	27.58	59.84
Total Without 1 & 2	20.72	15.37	16.98	18.58	29.05	31.12	40.60	35.30	59.84
Grand Total	24.70	19.37	20.47	19.16	31.75	32.79	43.97	35.79	61.07

Production Pounds for
Carol Stream Press Dept
Offline presses only

2000 pounds of substrate produced
297,224
272,002
329,448
393,663
341,927
302,430
323,143
294,432
378,747
411,493
293,974
219,297
3,847,780

Pounds above are based upon summary data still available in our data history and accepted as accurate

All Presses	Calendar Year 2000					
	Estimated Footage (lb)	Estimated Footage (lb)	Estimated Hours	Estimated Total (MOM) Pounds	Estimated Hours	Estimated Total (MOM) Pounds
14,861,200	5,201,420	192,85	1,443	8,840,065	214,66	3,365
13,600,100	4,760,035	176,30	1,321	8,840,065	196,45	3,079
16,472,400	5,785,340	213,53	1,599	10,707,060	297,93	3,730
19,683,150	6,889,103	255,15	1,911	12,794,048	284,31	4,457
17,098,950	5,983,723	221,62	1,660	11,112,628	248,95	3,871
15,121,500	5,292,525	196,02	1,468	9,828,975	218,42	3,424
16,157,150	5,655,003	209,44	1,569	10,502,148	233,38	3,656
14,221,600	4,977,660	184,35	1,381	9,244,040	205,42	3,220
18,937,950	6,628,073	245,48	1,839	12,309,278	273,54	4,288
20,574,650	7,201,128	268,71	1,998	13,373,523	297,19	4,658
14,698,700	5,144,545	190,54	1,427	9,554,156	212,31	3,328
10,964,650	3,837,698	142,14	1,065	7,127,153	158,38	2,483
92,389,000	67,386,150	2,494	18,690	25,052,850	2,779	43,560

The assumptions that were made to recreate this data are as follows

- 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
- 4 : Press 4 produced at a run rate of approximately 450 FPM and estimated hours are calculated 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 calculated based upon that

VOC Reporting to Edwin C. Bakowski | EPA provided through Mostardi Platt May 13th 2009
FESOP Application request for additional information ID No:043020ACJ

	1995	1996	1997	1998	1999	2000	2001	2002	2003
Press 1 & 2	3.98	4.06	3.49	0.58	2.70	1.67	3.37	0.49	1.23
Press 4	6.22	4.59	5.09	5.57	8.71	9.34	12.18	7.72	0.00
Press 5	14.50	10.72	11.89	13.01	20.34	21.78	28.42	27.58	59.84
Total without 1&2	20.72	15.31	16.98	18.58	29.05	31.12	40.60	35.30	59.84
Grand Total	24.70	19.37	20.47	19.16	31.75	32.79	43.97	35.79	61.07

Production Pounds for Carol Stream Press Dept Offline Presses only

2001 Pounds of substrate produced
224,200
279,999
371,488
463,077
454,040
470,136
484,074
397,472
329,620
388,883
296,024
361,312
4,500,325

Calendar Year 2001													
All Presses						Press 5							
Estimated Footage	Estimated Footage	Estimated Hours	Estimated Total Volume Pounds	Estimated Footage	Estimated Hours	Estimated Total Volume Pounds	Estimated Footage	Estimated Hours	Estimated Total Volume Pounds	Estimated Footage	Estimated Hours	Estimated Total Volume Pounds	
11,210,000	3,923,500	145.31	1,214	7,286,500	161.82	2,882	18,673,000	6,855,760	257.52	2,151	12,917,840	287.06	5,020
13,999,950	4,999,993	181.48	1,516	9,099,993	202.22	3,536	19,481,000	6,768,350	213.84	1,784	10,712,850	238.08	4,163
18,574,400	6,501,040	240.78	2,011	12,073,360	266.30	4,692	19,444,160	6,805,453	252.05	2,105	12,639,698	280.85	4,912
23,153,850	8,103,848	300.14	2,507	15,050,003	334.44	5,849	14,801,200	5,180,420	181.57	1,802	9,620,720	213.80	3,739
22,702,000	7,945,700	294.28	2,458	14,756,300	327.92	5,735	18,065,600	6,322,960	234.18	1,956	11,742,640	260.95	4,563
23,508,800	8,227,380	304.72	2,545	15,279,420	339.54	5,938	23,203,700	8,121,295	300.79	2,512	16,082,405	335.16	5,861
23,203,700	8,121,295	300.79	2,512	15,082,405	335.16	5,861	19,673,600	6,955,760	257.52	2,151	12,917,840	287.06	5,020
19,673,600	6,955,760	257.52	2,151	12,917,840	287.06	5,020	19,481,000	6,768,350	213.84	1,784	10,712,850	238.08	4,163
19,481,000	6,768,350	213.84	1,784	10,712,850	238.08	4,163	19,444,160	6,805,453	252.05	2,105	12,639,698	280.85	4,912
14,801,200	5,180,420	181.57	1,802	9,620,720	213.80	3,739	14,801,200	5,180,420	181.57	1,802	9,620,720	213.80	3,739
18,065,600	6,322,960	234.18	1,956	11,742,640	260.95	4,563	225,016,250	78,755,668	2,917	24,360,003	146,260,563	3,250	56,840

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

- 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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Press 1 & 2	3.98	4.06	3.49	0.58	2.70	1.67	3.37	0.49	1.23
Press 4	6.22	4.59	5.09	5.57	8.71	9.34	12.18	7.72	0.00
Press 5	14.50	10.72	11.89	13.01	20.34	21.78	28.42	27.58	59.84
Total without 1 & 2	20.72	15.31	16.98	18.58	29.05	31.12	40.80	35.30	59.84
Grand Total	24.70	19.37	20.47	19.16	31.75	32.79	43.97	35.79	61.07

Production Pounds
for Carol Stream
Press Dept Offline
presses only

2003 Pounds of substrate produced
549,180
551,534
636,383
648,821
457,928
401,362
423,349
616,558
538,688
470,097
432,784
398,009
6,024,883

Pounds above are based
upon summary data still
available in our data history
and accepted as accurate

Calendar Year 2003		Press 4 Shutdown and moved out of building		Press 5	
Total Estimated Footage	Estimated Footage	Estimated Hours	Estimated Total YOM/Min Pounds	Estimated Footage	Estimated Total YOM/Min Pounds
27,459,500	0	0.00	0.00	27,459,500	610.21
27,576,700	0	0.00	0.00	27,576,700	612.82
31,818,150	0	0.00	0.00	31,818,150	707.09
27,441,050	0	0.00	0.00	27,441,050	609.80
22,896,400	0	0.00	0.00	22,896,400	508.81
20,088,100	0	0.00	0.00	20,088,100	445.96
21,167,450	0	0.00	0.00	21,167,450	470.39
30,827,900	0	0.00	0.00	30,827,900	685.08
26,934,400	0	0.00	0.00	26,934,400	598.54
23,504,850	0	0.00	0.00	23,504,850	522.33
21,638,200	0	0.00	0.00	21,638,200	480.85
19,900,450	0	0.00	0.00	19,900,450	442.23
301,234,150	0	0.00	0.00	301,234,150	6,589.4
					1,978,800.00

The assumptions that were made to recreate this data are as follows

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Grand Total	24.70	19.37	20.47	19.16	31.75	32.79	43.97	35.79	61.07