

Jun 21, 2024

Indiana Department of Environmental Management  
Office of Water Quality  
100 N. Senate Avenue  
Indianapolis, IN 46204-2251

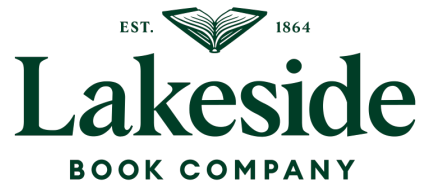
Attn: Kim Rohr,  
Chief Wastewater Inspection Section Office of Water Quality

Re: Inspection Summary/ Noncompliance Letter , Montgomery County  
LSC Communications, Inc. NPDES  
Permit No. IN0002097 Crawfordsville

Dear Ms Rohr:

In response to your Inspection Summary/Noncompliance Letter, dated Jun 19, 2024 pertaining to an inspection completed by Jason Palin on June 17th, we are providing the following information regarding the monitoring frequency and effluent limits noncompliance.

1. Unsatisfactory finding on specific effluent monitoring frequency: Temperature and chlorine monitoring frequency .  
This oversight was brought to our attention by Greg Glover, IDEM OWQ Compliance Manager on May 16, 2024. A response letter was submitted back to Mr. Glover on May 22, 2024 indicating our corrective actions at the plant to return us to full compliance of the NPDES Permit requirements. These corrective actions are indicated on the 5/16/2024 inspection report by Mr Palin and in your letter. Monitoring frequency for temperature and chlorine has been increased to two times per month.
2. Effluent Limit Compliance finding: Temperature and chlorine effluent limit violations in February, March, April and June  
These parameter violation were also addressed in the letter to Mr. Glover with the following corrective actions:  
An automated control component has been repaired, chlorine meters have been replaced after calibration failure and a fire suppression maintenance process has been updated to ensure that valves are completely closed and checked for a complete seal after maintenance work is completed.



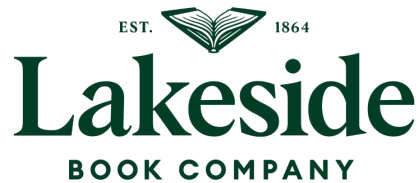
In addition, please note that the facility is currently in the process of connecting the permitted Outfall NP001 to the Crawfordsville Municipal sewage system. The scope of the project requires several permits from various State and local entities and is requiring a longer timeframe than originally anticipated. We hope to complete this project by the end of the year and close the NPDES permit soon after.

Should you have any questions or need additional information, please contact me at (540)217-7317.

Sincerely,

[Laura Naftel](#)

Environmental Manager  
LSC Communication Book LLC (d/b/a Lakeside Book Company)  
(successor in interest to LSC Communications US, LLC)



May 22, 2024

Indiana Department of Environmental Management  
Office of Water Quality  
100 N. Senate Avenue  
Indianapolis, IN 46204-2251

Attn: Greg Glover  
Senior Environmental Manager

Re: Noncompliance Letter  
NPDES Permit NO. IN0002097  
LSC Communications - Montgomery Co.

Dear Mr. Glover:

In response to your letter dated May 16, 2024, regarding noncompliance events for the period of January 2023 through March 2024 we submit the following corrective action plan.

Outfall 001

1. February and March 2024 Chlorine exceedances-Failed control of automated equipment blowdown.
2. January, February and March 2024 Temperatures exceedance - Failed control of automated equipment blowdown.

Automated equipment has been removed. Process is now managed by a building specialist.

Outfall 002

1. June 2023 Chlorine exceedance - Chlorine meters have been replaced after calibration failure
2. February 2023 Temperature exceedance - Fire suppression system holding tank valve was left slightly open after maintenance. Valves are now rechecked for function after maintenance is complete.

Sampling schedule noncompliance

Sampling procedures have been reviewed and additional monthly sampling events for temperature and chlorine have been implemented.



In addition we are currently applying for permits to connect the boiler room discharge NP001 to the municipal sewer system. We are currently working with IDEM OWQ, the City of Crawfordsville and the municipal treatment plant to ensure appropriate permits are applied for. Due to the complexity of the project, multiple permits are required causing delays in the progress of the project. Elimination of the effluent to the outfall is expected to be complete by the end of the year allowing the facility to apply for termination of the current NPDES permit.

Should you have any questions or need additional information, please contact me at (756)-225-2716 or our Environmental Manager, Laura Naftel at (540)217-7317.

Sincerely,

Michael Berendes

Operations Director - Crawfordsville  
LSC Communication Book LLC (d/b/a Lakeside Book Company)  
(successor in interest to LSC Communications US, LLC)