

217/782-2113

"REVISED"  
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Jefferson Smurfit Corporation  
Attn: Julie Robinson  
1501 Indiana Avenue  
St. Charles, Illinois 60174

Application No.: 95070018                      I.D. No.: 089483AAC  
Source Location: 1501 Indiana Avenue, St. Charles, Kane County  
Operation of: Sheetfed Lithographic Printing for labels  
Date Received: July 6, 1995  
Date Issued: January 25, 1999                      Expiration Date: January 25, 2004  
Responsible Official: Julie Robinson/General Manager

This permit is hereby granted to the above-designated Permittee to operate a Sheetfed Lithographic Printing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: October 10, 2000  
Revision Date Issued: December 28, 2000  
Purpose of Revision: Administrative Amendment

This administrative amendment includes insignificant activities that were not listed on the original permit. Because the changes in the permit were only administrative, no formal public notice was issued.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous permit issued January 25, 1999 is incorporated herein by reference.

Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

If you have any questions concerning this permit, please contact Nathan Frank at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:NAF:psj

cc: Illinois EPA, FOS, Region 1

USEPA

- <sup>1</sup> This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.
- <sup>2</sup> Except as provided in Condition 8.7 of this permit.

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	6
3.1 Identification of Insignificant Activities	
3.2 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	7
5.0 OVERALL SOURCE CONDITIONS	8
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)	13
6.1 Description of ERMS	
6.2 Applicability	
6.3 Obligation to Hold Allotment Trading Units (ATUs)	
6.4 Market Transaction	
6.5 Emission Excursion Compensation	
6.6 Quantification of Seasonal VOM Emissions	
6.7 Annual Account Reporting	
6.8 Allotment of ATUs to the Source	
6.9 Recordkeeping for ERMS	
6.10 Federal Enforceability	
7.0 UNIT SPECIFIC CONDITIONS	19
7.1 Printing Presses for printing and/or coating	



1.0 SOURCE IDENTIFICATION

1.1 Source

Jefferson Smurfit Corporation - US  
1501 Indiana Avenue  
St. Charles, Illinois 60174  
(630) 584-2900

I.D. No.: 089483AAC  
Standard Industrial Classification: 2752, Lithographic Printing

1.2 Owner/Parent Company

Jefferson Smurfit Corporation - US  
8182 Maryland Avenue  
Clayton , Missouri 63105

1.3 Operator

Jefferson Smurfit Corporation  
1501 Indiana Avenue  
St. Charles , Illinois 60174

Julie Robinson  
(630) 584-2900

1.4 General Source Description

Jefferson Smurfit Corporation is located at 1501 Indiana Avenue, St. Charles in Kane County. The source conducts non-heatset offset lithographic printing and coating operations. The printing presses are capable of applying inks and/or coatings on sheets of paperboard substrates. In addition, fountain solutions and cleaning agents are used as manufacturing aids during the printing process.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
°C	Degree Centigrade
ERMS	Emission Reduction Market System
°F	Degree Fahrenheit
Ft <sup>3</sup>	cubic foot
gal	Gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	Kilogram
l	Liter
lb	pound
m	meter
MG	Megagram
mmBtu	Million British thermal units
mo	Month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SO <sub>2</sub>	Sulfur Dioxide
T	Tons
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
%	Percent
wt. %	Weight Percent
yr	year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

2 Film development equipment

2 Parts Cleaners

1 Plate developing equipment

Natural gas fired boilers with a rated capacity less than 10 mmBtu/hr

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse or treated or chemically contaminated wood [35 IAC 201.210 (a)(4)(C)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

#### 3.2 Addition of Insignificant Activities

- 3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

- 3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those

identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

- 3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Printing Press (P1)	Sheetfed Non-Heatset Offset Lithographic Press	1963	None
Printing Press (P2)	Sheetfed Non-Heatset Offset Lithographic Press	1980	None
Printing Press (P3)	Sheetfed Non-Heatset Offset Lithographic Press	1980	None
Printing Press (P4)	Sheetfed Non-Heatset Offset Lithographic Press	1991	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- 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.

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.2.5 Should this stationary source, as defined in 40 CFR Part 63, become subject to 40 CFR Part 63, then the owner or operator shall comply with the applicable requirements of 40 CFR Part 63 by the date(s) specified in the NESHAP and shall certify compliance with the applicable requirements of 40 CFR Part 63 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	82.0
Sulfur Dioxide (SO <sub>2</sub> )	---
Particulate Matter (PM)	1.0
Nitrogen Oxides (NO <sub>x</sub> )	---
HAP, not included in VOM or PM	1.0
TOTAL	84.0

#### 5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

#### 5.5.3 Other Source-Wide Emission Limitations

Other Source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources construction and modification, 35 IAC Part 203, or Section 502 (b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

### 5.6 General Recordkeeping Requirements

#### 5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

#### 5.6.2 Records for Operating Scenarios

N/A

#### 5.6.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is

readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

## 5.7 General Reporting Requirements

### 5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

### 5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

## 5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

## 5.9 General Compliance Procedures

### 5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

Total VOM emissions from the source shall be calculated based on the following:

$$E_T = E_c + E_I + E_o$$

Where:

$E_T$  = Total VOM emissions, in pounds/month

- $E_c$  = VOM emissions from all coatings, in pounds/month  
 $E_I$  = VOM emissions from all printing inks, in pounds/month  
 $E_o$  = VOM emissions from all other VOM-containing materials (e.g., fountain solutions, cleanup solvents in pounds/month)

and

$$E_c = \sum_{i=1}^n U_i V_i$$

where:

$U_i$  = Usage of coating  $i$ , in gallons/month

$V_i$  = Overall VOM content of coating  $i$ , in lb VOM/gal

and the summation  $\Sigma$  is over all coatings  $i$ ; and

$$E_I = \left( \sum_{k=1}^n U_k V_k \right) \times (1 - 95^*/100)$$

where:

$U_k$  = Usage of printing ink  $k$ , in pounds/month

$V_k$  = Overall VOM content of printing ink  $k$ , in weight percent

and the summation  $\Sigma$  is over all printing inks  $k$

\* For sheetfed non-heatset offset printing 95% of the VOM in inks is retained on the substrate and hence not emitted; and

$$E_o = \sum_{j=1}^n U_j V_j$$

where:

$U_j$  = Usage of VOM-containing material  $j$ , in lb/month

$V_j$  = VOM content of VOM-containing material  $j$ , in weight percent

and the summation  $\Sigma$  is over all VOM-containing materials  $j$  (other than coatings and printing inks).

Particulate matter emissions from coating operation

$$\left[ (\text{lbs of solids in coating}) \times (\% \text{ Overspray}) \times \right. \\ \left. \left( 1 - \frac{\text{Control equipment efficiency}}{100} \right) \right]$$

## 6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

### 6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). Sources may also transfer or sell the ATUs that they holds to other sources or participants (35 IAC 205.630).

### 6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

### 6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
  - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
  - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

### 6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

#### 6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
  - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
  - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

#### 6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance

with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.650(a), and shall be submitted in accordance with the following:
  - i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
  - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

#### 6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
  - i. Actual seasonal emissions of VOM from the source;
  - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
  - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
  - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
  - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit

compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

#### 6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 243 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 27.58 tons.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Section 7 of this permit.

iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

Not applicable.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
- ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

#### 6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

#### 6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 1 Printing press # P1 [Sheetfed Non-heatset Offset Lithographic Printing Press capable of printing and also for applying coatings on sheets of paperboard substrates].

Unit 2 Printing press # P2 [Sheetfed Non-heatset Offset Lithographic Printing Press capable of printing and also for applying coatings on sheets of paperboard substrates].

Unit 3 Printing press # P3 [Sheetfed Non-heatset Offset Lithographic Printing Press capable of printing and also for applying coatings on sheets of paperboard substrates].

Unit 4 Printing press # P4 [Sheetfed Non-heatset Offset Lithographic Printing Press capable of printing and also for applying coatings on sheets of paperboard substrates].

7.1.1 Description

The Permittee is a manufacturer of labels for boxes, bottles, cans and jars. The printing presses are capable of applying inks and coatings on sheet of paperboard substrate. During the printing process besides printing inks, fountain solutions, and cleaning agents are used. During coating process coatings/varnishes are used.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Press # P1	Non-heatset lithographic printing and/or coating press	None
Press # P2	Non-heatset lithographic printing and/or coating press	None
Press # P3	Non-heatset lithographic printing and/or coating press	None
Press # P4	Non-heatset lithographic printing and/or coating press	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected printing line" for the purpose of these unit specific conditions is a press when printing operation is performed. As of the "date issued" as shown on page 1 of this permit, the affected printing lines are identified in Condition 7.1.2.
- b. An "affected coating line" for the purpose of these unit specific condition is a press when coating

operation is performed. As of the "date issued" as shown on page 1 of this permit, the affected coating lines are identified in Condition 7.1.2

c. Each press when operating as an affected printing line or an affected coating line is subject to the limits identified in Condition 5.2.2.

d. Presses # P2, P3 and P4 when operating as an affected printing line or coating line at the source are subject to 35 IAC 212.321(a), which requires that:

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

ii. The emissions of particulate matter into the atmosphere in any one hour period from the affected presses shall not exceed the allowable emission rates specified in the following equation:

$$E = A(P)^B$$

where:

P = \*process weight rate; and,

E = allowable emission rate; and,

\* For coating lines the process weight rate is the weight of the coating only and for printing lines the process weight rate is the weight of the inks and fountain solution.

A. For process weight rates up to 408 MG/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr

A	1.214	2.54
B	0.534	0.534

B. For process weight rates in excess of 408 MG/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour [35 IAC 212.321].

e. Press # P1 when operating as an affected printing line or coating line at the source is subject to 35 IAC 212.322(a), which requires that:

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

ii. The emissions of particulate matter into the atmosphere in any one hour period from the affected press shall not exceed the allowable emission rates specified in the following equation:

$$E = C + A(P)^B$$

where:

P = \*process weight rate; and,

E = allowable emission rate; and,

\* For coating lines the process weight rate is the weight of the coating only and for printing lines the process weight rate is the weight of the inks and fountain solution.

A. For process weight rates up to 27.2 MG/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534
C	0.0	0.0

B. For process weight rates in excess of 27.2 MG/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16
C	-18.4	-40.0

where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour [35 IAC 212.322].

f. When printing operation is performed on the presses, the affected printing lines are subject to the following:

i. The Permittee shall not cause or allow the operation of any affected printing line unless:

A. The VOM content of the as-applied fountain solution is 5 percent or less, by volume [35 IAC 218.407 (a)(3)(A); or

B. The VOM content of as-applied fountain solution shall be 8.5 percent or less, by volume, and the temperature of the

fountain solution is maintained below 15.6°C (60°F)[35 IAC 218.407 (a)(3)(B)].

- ii. A. The VOM content of the as-used cleaning solution is less than or equal to 30 percent by weight [35 IAC 218.407 (a)(4)(A)] or
- B. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F)[35 IAC 218.407 (a)(4)(B)].
- iii. The VOM containing cleaning materials, including used cleaning towels, associated with any printing line, shall not be kept, stored or disposed of in any manner other than in closed containers [35 IAC 218.407 (a)(5)].
- g. The affected printing lines at the source are subject to 35 IAC 218.301 which requires that:

The Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from the subject printing line. If no odor nuisance exists the limitation shall apply only to photochemically reactive material as defined in 35 IAC 211.4690.

- h. When coating operations are performed on the presses, the affected coating lines are subject to the following:
  - i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Paper. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator [35 IAC 218.204 (c )]:

<u>kg/liter</u>	<u>lbs/gallon</u>
0.28	2.3

- ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected coating lines are not subject to 35 IAC 218.301, use of organic material, pursuant to 35 IAC 218.309, Exemption From General Rule on Use of Organic Material which excludes affected coating lines from this requirement.

7.1.5 Operational and Production Limits and Work Practices

None

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected printing and/or coating lines are subject to the following:

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit. The limitations for material usage and corresponding emissions established in Construction Permit 91080052 are no longer applicable for this source. These limitations were established so that the printing operation would not be subject to 35 IAC 218 Subpart TT. Effective March 15, 1996, the printing operation is subject to 35 IAC 218.407 (Emission Limitations and Control Requirements for Lithographic Printing Lines on and after March 15, 1996). The usage and emission limits are withdrawn, as the printing operation is complying with the requirements of 35 IAC 218.407.

7.1.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), 218.204, 218.409 and Section 39.5(7)(b) of the Act]

- a. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings, and cleaning solvents used on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
  - i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference

Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a);

- ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(a) directly reflect the application of such material and separately account for any additions of solvent [35 IAC 218.105(a)].
- b. Upon reasonable request by the Illinois EPA, the VOM content of fountain solution, cleaning solution, and cleaning solvents used on the affected printing line shall be determined to demonstrate compliance with 35 IAC 218.407 (a)(3) and (4) according to USEPA Reference Methods 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) and 218.110.
  - i. The VOM content of representative materials "as applied" on the affected printing line shall be determined according to USEPA Reference Methods 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a);or
  - ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(b) directly reflect the application of such material and separately account for any additions of solvent [35 IAC 218.105(a)].
  - iii. Testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvents concentrates and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 IAC 218.110 [35 IAC 218.409(e)].

#### 7.1.8 Monitoring Requirements

When printing operations are performed on the presses, the affected printing lines are subject to the following:

- a. The Permittee when relying on the temperature of the fountain solution to comply with Condition 7.1.3(f)(i), shall install, maintain, and continuously

operate a temperature monitor of the fountain solution in the reservoir or fountain tray, as applicable. The temperature monitor must be capable of reading with an accuracy of 0.3°C or 0.5°F, and must be attached to an automatic, continuous recording device such as a strip chart, recorder, or computer, with at least the same accuracy, that is installed, calibrated and maintained in accordance with the manufacturer's specifications. If the automatic, continuous recording device malfunctions, the owner or operator shall record the temperature of the fountain solution at least every two operating hours. The automatic, continuous recording device shall be repaired or replaced as soon as practicable.

- b. For fountain solution to which VOM is not added automatically, the following records should be maintained:
  - i. Date and time of preparation and each subsequent modification of the batch;
  - ii. Volume and VOM content of each component used in, or subsequently added to, the fountain solution batch; and
  - iii. Calculated VOM content of the as-applied fountain solution.
- c. For fountain solutions to which VOM is added at the source with automatic feed equipment which makes additions of VOM up to a pre-set level. The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications.
- d. For cleaning solutions that are prepared at the source that automatically mixes cleaning solvent and water (or other non-VOM) the following should be followed:
  - i. The Permittee shall install, operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed; and
  - ii. Pre-set automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with 35 IAC 218.407 (a)(4)(A).

#### 7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected coating line and printing line to demonstrate compliance with Conditions 5.5.1 and 7.1.3, of this section, pursuant to Section 39.5(7)(b) of the Act:

- a. Pursuant to 35 IAC 218.211 (c ), the Permittee shall collect and record the following information:
  - i. The name and identification of each coating as applied on each coating line; and
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
- b. Pursuant to 35 IAC 218.411 (c ), the Permittee shall collect and record the following information:
  - i. The name and identification of each batch of fountain solution prepared for use on one or more printing lines or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch; and
  - ii. For each batch of as-applied fountain solution, the following should be recorded:
    - A. Date and time of preparation and each subsequent modification of the batch;
    - B. Volume and VOM content of each component used in, or subsequently added to, the fountain solution batch; and
    - C. Calculated VOM content of the as-applied fountain solution (volume percent).
  - iii. The Permittee when relying on the temperature of the fountain solution to comply with Condition 7.1.3(f)(i), then the Permittee shall collect and record the temperature of the fountain solution at each printing line, as monitored in accordance with Condition 7.1.8 (a).

- iv. For each cleaning solution which is prepared at the source with automatic equipment, the following should be recorded:
  - A. The name and identification of each cleaning solution;
  - B. The VOM content of each cleaning solvent in the cleaning solution;
  - C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
  - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
  - E. The VOM content of the as-used cleaning solution, with supporting calculations (weight percent); and
  - F. A calibration log for the automatic equipment, detailing periodic checks.
  
- v. For each cleaning solution which is not prepared at the source with automatic equipment, the following should be recorded:
  - A. The name and identification of each cleaning solution;
  - B. Date and time of preparation, and subsequent modification, of the batch;
  - C. The VOM content of each cleaning solvent in the cleaning solution;
  - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
  - E. The VOM content of the as-used cleaning solution, with supporting calculation (weight percent).

- vi. For each batch of cleaning solution for which the Permittee relies on the vapor pressure of the cleaning solution to demonstrate compliance with condition 7.1.3(f)(ii)(B), the following records should be recorded:
  - A. The name and identification of each cleaning solution;
  - B. Date and time of preparation, and each subsequent modification, of the batch;
  - C. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with the test condition 7.1.7(b)(iii);
  - D. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
  - E. The VOM composite partial pressure of each as-used cleaning solution, as determined in accordance with the test condition 7.1.7(b)(iii).
- c. The Permittee shall maintain records of the amount of each ink and coating used in lb/month and tons/year.
- d. The Permittee shall maintain records of the VOM content of each ink, and coating used in weight percent.
- e. The Permittee shall maintain records of the amount of each fountain solution used in lb/month and tons/year.
- f. The Permittee shall maintain records of the VOM content of each fountain solution used in weight percent.
- g. The Permittee shall maintain records of each cleanup solvent used in lb/month and tons/year.
- h. The Permittee shall maintain records of the VOM content of each cleanup solvent used in weight percent.
- i. Amount of cleanup solvent reclaimed for reuse or sent offsite for disposal.

- j. VOM emissions from use of inks, coatings and fountain solutions and cleanup solvents in lb/month and tons/year.
- k. Records of the testing of VOM and HAP content (wt. %) of each coating, ink, fountain solution and cleaning solution as tested pursuant to the conditions of this section, which include the following [Section 39.5(7)(e) of the Act]:
  - i. Identification of material tested;
  - ii. Results of analysis;
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.
- l. The operating schedule of each affected printing and/or coating line.

#### 7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected printing or coating line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Pursuant to 35 IAC 218.211 (c)(3)(A), 218.411 (c)(3), and 218.411 (d)(3) the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.1.3 (e) and (g) within 30 days of such an occurrence.

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected printing and/or coating lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings, inks, fountain solutions and cleaning solutions at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this section, the source wide emission

limitations in Condition 5.5.1 are not exceeded and the affected coating lines remain in compliance.

7.1.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the printing and/or coating lines and the work-practices inherent in operation of the printing and/or coating lines.
- b. Compliance of coatings, fountain solutions and cleanup solvents with the VOM emission limitations shall be determined from the testing required by this section.

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after July 16, 1998 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA,

emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

#### 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

#### 8.6 Reporting Requirements

##### 8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period

Report Due Date

January - June

September 1

July - December

March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

#### 8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);

- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
  - i. Illinois EPA - Air Compliance Section
 

Illinois Environmental Protection Agency  
Bureau of Air  
Compliance Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276
  - ii. Illinois EPA - Air Regional Field Office
 

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Eisenhower Tower  
1701 First Avenue  
Maywood, Illinois 60153
  - iii. Illinois EPA - Air Permit Section (MC 11)
 

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section  
P.O. Box 19506  
Springfield, Illinois 62794-9506
  - iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner

unless an alternate schedule for compliance with the applicable requirement is established.

#### 9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

#### 9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

#### 9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

#### 9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

### 9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

#### 9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

#### 9.5 Liability

##### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

##### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

##### 9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

#### 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

#### 9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

### 9.6 Recordkeeping

#### 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

#### 9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

#### 9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

### 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

#### 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certifications shall include descriptions of means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

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 [Section 39.5(7)(o)(ii) of the Act].

##### 9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-

based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
  - ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
  - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

#### 9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

#### 9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

#### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

#### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA 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 the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such

records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

#### 9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Summary of Equipment

TABLE 1-1

Unit Number	Date Installed	Emission Unit Number	Description
1	1963	Printing Press # P1	Sheetfed Non-heatset Offset Lithographic Press for Printing and/or paper coating operation
2	1980	Printing Press # P2	Sheetfed Non-heatset Offset Lithographic Press for Printing and/or paper coating operation
3	1980	Printing Press # P3	Sheetfed Non-heatset Offset Lithographic Press for Printing and/or paper coating operation
4	1991	Printing Press # P4	Sheetfed Non-heatset Offset Lithographic Press for Printing and/or paper coating operation



I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. Unlike this source's current state operating permit(s), the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Jefferson Smurfit Corporation is located at 1501 Indiana Avenue, St. Charles in Kane County. The source conducts non-heatset offset lithographic printing and coating operations. The printing presses are capable of applying inks and/or coatings on sheets of paperboard substrates. In addition, fountain solutions and cleaning agents are used as manufacturing aids during the printing process.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
Printing Press (P1)	Sheetfed Non-Heatset Offset Lithographic Press	1963	None
Printing Press (P2)	Sheetfed Non-Heatset Offset Lithographic Press	1980	None
Printing Press (P3)	Sheetfed Non-Heatset Offset Lithographic Press	1980	None
Printing Press (P4)	Sheetfed Non-Heatset Offset Lithographic Press	1991	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions. The proposed permit limits the maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source limit.

For purposes of fees, the source is allowed the following emissions:

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	81.48
Sulfur Dioxide (SO <sub>2</sub> )	---
Particulate Matter (PM)	5.11
Nitrogen Oxides (NO <sub>x</sub> )	---
HAP, not included in VOM or PM	0.2952
TOTAL	86.8852

## IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

## V. PROPOSED PERMIT

A CAAPP permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

## VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public

interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

RS:jar