

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

The Segerdahl Corporation  
Attn: John Romita, VP Manufacturing  
1351 South Wheeling Road  
Wheeling, Illinois 60090

Application No.: 95070052

I.D. No.: 031324ABR

Applicant's Designation:

Date Received: December 5, 2006

Subject: Printing Plant

Date Issued: January 30, 2009

Expiration Date: January 30, 2014

Location: 1351 South Wheeling Road, Wheeling, Cook County, 60090

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Two (2) 5C Heatset Web Printing Presses (Press #20 and Press #22) with Catalytic Thermal Oxidizers;  
7C Heatset Web Printing Press (Press #21) with a Catalytic Thermal Oxidizer;  
6C Heatset Web Printing Press (Press #23) Controlled by a Catalytic Thermal Oxidizer (Shared with Press #22's Oxidizer);  
Two (2) 5C Heatset Web Printing Presses (Press #24 and Press #26) with Dryer/Oxidizer Combos;  
6C Heatset Web Printing Press (Press #25) with a Dryer/Oxidizer Combo;  
6C Heatset Web Printing Press (Press #27) with a Catalytic Thermal Oxidizer;  
7C Heatset Web Printing Press (Press #28) with a Dryer/Oxidizer Combo;  
Printing Dryers;  
Three (3) 6C Sheetfed Printing Presses (Press #30 , Press #31 and Press #32) with Aqueous Coaters;  
4C Sheetfed Printing Press (Press #33);  
2C Ryobi Sheetfed Printing Press (Press #34);  
2C Ryobi Sheetfed UV Printing Press (Press #35);  
Inkjet Label Printing System; and  
Natural Gas-Fired Fuel Combustion Units Less than 2.5 mmBtu/Hour.

This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
  - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for total HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.

- ii. To establish federally enforceable Emission Reduction Market System (ERMS) provisions, including baseline emissions, allotment for each seasonal allotment period, identification of any units deemed to be insignificant activities for the purposes of the ERMS, emissions calculation methodologies, and provisions addressing all other applicable requirements of 35 Ill. Adm. Code Part 205, which are described in Attachment B.
  - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
  - c. This permit supersedes all operating permits issued for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
  - c. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
  - d. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
  - e. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
    - i. The name and address of the source;

- ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- f. Pursuant to 35 Ill. Adm. Code 212.321(a), 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 which, 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 35 Ill. Adm. Code 212.321(c).
4. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.
- 5a. Pursuant to 35 Ill. Adm. Code 218.204(c), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. The following emission limitations are 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, except where noted. 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 composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. The emission limitations are as follows:

	<u>kg/l</u>	<u>lb/gal</u>
Paper Coating	0.28	(2.3)

- b. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, 218.304 and the following exception: if no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.
- c. Pursuant to 35 Ill. Adm. Code 218.407(a)(1), no owner or operator of lithographic printing line(s) subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart H shall cause or allow the operation of any heatset web offset lithographic printing line unless:
  - i. The total VOM content in the as-applied fountain solution shall not exceed:
    - A. 1.6 percent, by volume.
    - B. 3 percent or less, by volume, and the temperature of the fountain solution is maintained below 15.6°C (60°F), measured at the reservoir or the fountain tray; or
    - C. 5 percent or less, by volume, and the as-applied fountain solution contains no alcohol.
  - ii. The air pressure in the dryer is maintained lower than the air pressure of the press room, such that the air flow through all openings in the dryer, other than the exhaust, is into the dryer at all times when the printing line is operating;
  - iii. An afterburner is installed and operated so that VOM emissions (excluding methane and ethane) from the press dryer exhaust(s) are reduced by 90 percent, by weight, or to a maximum afterburner exhaust outlet concentration of 20 ppmv (as carbon);
  - iv. The afterburner is equipped with the applicable monitoring equipment specified in 35 Ill. Adm. Code 218.105(d)(2) and the monitoring equipment is installed, calibrated, operated, and maintained according to manufacturer's specifications at all times when the afterburner is in use; and
  - v. The afterburner is operated at all times when the printing line is in operation, except the afterburner may be shut down between November 1 and April 1 as provided in 35 Ill. Adm. Code 218.107.
- d. Pursuant to 35 Ill. Adm. Code 218.407(a)(3), no owner or operator shall cause or allow the operation of any sheet-fed offset lithographic printing line unless:

- i. The VOM content of the as-applied fountain solution is 5 percent or less, by volume; or
  - ii. The VOM content of the as-applied fountain solution is 8.5 percent or less, by volume, and the temperature of the fountain solution is maintained below 15.6°C (60°F), measured at the reservoir or the fountain tray;
- e. Pursuant to 35 Ill. Adm. Code 218.407(a)(4), no owner or operator of lithographic printing line(s) subject to the requirements of 35 Ill. Adm. Code 218 Subpart H shall cause or allow the use of a cleaning solution on any lithographic printing line unless:
  - i. The VOM content of the as-used cleaning solution is less than or equal to 30 percent, by weight; or
  - ii. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F).
- f. Pursuant to 35 Ill. Adm. Code 218.407(a)(5), no owner or operator of lithographic printing line(s) subject to the requirements of 35 Ill. Adm. Code 218 Subpart H shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored or disposed of in any manner other than in closed containers.
- 6. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.
- 7a. The combustion chambers of the thermal oxidizer and dryers/oxidizers combination associated with the lithographic presses shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test, before the printing process is begun, and this temperature shall be maintained during operation of the affected printing lines.
- b. The catalytic oxidizers combustion chambers shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test. This temperature shall be maintained during operation.
- c. The Permittee shall, in accordance with the manufacturer's and/or vendor's recommendations, perform periodic maintenance on the oxidizers such that the oxidizers are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.

d. The dryers/oxidizers associated with the heatset web offset printing presses shall only be operated with natural gas as the fuel. The use of any other fuel in the dryers/oxidizers requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.

8a. Emissions of the heatset web offset lithographic printing line 21 shall not exceed the following limits:

i. Ink usage and emissions:

<u>Material</u>	<u>Material Usage (Lb/Mo)</u>	<u>Material Usage (Lb/Yr)</u>	<u>VOM Content (% by Wt.)</u>	<u>VOM Emissions (Lb/Mo)</u>	<u>VOM Emissions (Ton/Yr)</u>
Ink	30,000	300,000	43.97	308	2.65

These limits are based on 20% retention for the heatset ink and 95% destruction efficiency by the afterburner.

ii. Fountain solution, blanket wash, and solvent usage and emissions:

<u>Material</u>	<u>Material Usage (Gal/Mo)</u>	<u>Material Usage (Gal/Yr)</u>	<u>VOM Content (Lb/Gal)</u>	<u>VOM Emissions (Lb/Mo)</u>	<u>VOM Emissions (Ton/Yr)</u>
Fountain Solution	55.0	550	4.94	91	0.45
UV Wash	28	275	7.40	207	1.00
Automatic Blanket Wash	55.0	550	6.96	238	1.20
Manual Wash	83	825	4.90	405	2.00
MRC Cleaner	55	550	1.94	107	<u>0.55</u>
				Total:	<u>5.20</u>

These limits are based on 70% capture efficiency of the fountain solution, coatings and adhesives, 50% retention wash-up solvents in rags, and 95% destruction efficiency by the afterburner.

iii. The above limitations were established in Permit 08070041, pursuant to 35 Ill. Adm. Code Part 203 and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source of major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203 and the federal rules for Prevention of Significant Deterioration (PSD), 40 CDR 52.21.

b. Emissions of the heatset web offset lithographic printing line 28 shall not exceed the following limits:

i. Ink and adhesive usage and emissions:

<u>Material</u>	<u>Material Usage (Lb/Mo)</u>	<u>Usage (Lb/Yr)</u>	<u>VOM Content (% by Wt.)</u>	<u>VOM Emissions (Lb/Mo)</u>	<u>(Ton/Yr)</u>
Ink	5,500	55,000	43.97	96.73	0.48
Water-based Adhesives	100	1,000	10.00	1.83	0.01
Solvent-based Adhesives	40,000	400,000	3.33	243.38	1.22
				Total:	1.71

These limits are based on 20% retention for the heatset ink, 86.03% capture efficiency for adhesives, and 95% destruction efficiency by the afterburner.

ii. Fountain solution, blanket wash, and solvent usage and emissions:

<u>Material</u>	<u>Material Usage (Gal/Mo)</u>	<u>Usage (Gal/Yr)</u>	<u>VOM Content (Lb/Gal)</u>	<u>VOM Emissions (Lb/Mo)</u>	<u>(Ton/Yr)</u>
Fountain Solution	88.0	880	1.00	29.48	0.15
UV Wash	11.0	110	7.40	44.70	0.22
Automatic Blanket Wash	121.0	1,210	6.96	522.14	2.61
Manual Wash	209.0	2,090	4.90	1,024.10	5.12
MRC Cleaner	93.5	935	1.94	181.39	0.91
				Total:	9.01

These limits are based on 20% retention for the heatset ink, 70% capture efficiency of the low VOM fountain solution, coatings and adhesives, 50% retention wash-up solvents in rags, and 95% destruction efficiency by the afterburner.

iii. The above limitations were established in Permit 08070041, pursuant to 35 Ill. Adm. Code Part 203 and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source of major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203 and the federal rules for Prevention of Significant Deterioration (PSD), 40 CDR 52.21.

c. Emissions and operation of the heatset web offset printing press #25 shall not exceed the following limits:

i. Ink, fountain solution, solvent, coating and adhesive VOM Content:

<u>Raw Material</u>	<u>VOM Content (vol. % or Wt. %)</u>
Ink	37.5 wt. %
Fountain Solution	5.0 vol. %
Wash-Up Solvents	100.0 vol. %
Coating and Adhesive	50.0 wt. %

- ii. Ink, fountain solution, solvent, coating and adhesive usage and emissions:

<u>Raw Material</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
Ink	50,200	502,000	373	1.85
Fountain Solution	13,600	136,000	259	1.30
Wash-Up Solvents	1,750	17,500	875	4.40
Coating and Adhesive	87,840	878,419	792	3.95
			Total:	11.50

These limits are based on 20% retention for the heatset ink, 70% capture efficiency of the low VOM fountain solution, coatings and adhesives, 50% retention wash-up solvents in rags, and 97.5% destruction efficiency by the afterburner.

- iii. The above limitations were established in construction permit 97100086, pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that construction addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203.
- d. Emissions and operation of each heatset web offset printing presses #24 and #26 shall not exceed the following limits:
  - i. Ink, fountain solution, solvent, coating and adhesive VOM Content:

<u>Raw Material</u>	<u>Average VOM Content (Wt. %)</u>
Ink	37.5
Fountain Solution	6.0
Wash-Up Solvents	100.0
Coating and Adhesive	2.38

- ii. Ink, fountain solution, solvent, coating and adhesive usage and emissions:

<u>Raw Material</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
Ink	50,200	502,000	373	1.85
Fountain Solution	13,600	136,000	259	1.30
Wash-Up Solvents	1,750	17,500	875	4.40
Coating and Adhesive	87,840	878,419	792	3.95
			Total:	11.50

These limits are based on 20% retention for the heatset ink, 70% capture efficiency of the low VOM fountain solution, coatings and adhesives, 50% retention wash-up solvents in rags, and 97.5% destruction efficiency by the afterburner.

- iii. The above limitations were established in construction permit 97100086, pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that construction addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203.
- e. Emissions of the heatset web offset lithographic printing lines #20, #22, #23, and #27 shall not exceed the following limits:

<u>Line</u>	VOM Emissions	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
#22/#23	1.31	13.12
#20	0.66	6.56
#27	0.6	5.33

- i. These limits are based on 20% retention for the heatset ink, 70% capture efficiency of the low VOM fountain solution, 40% capture efficiency of the blanket wash, adhesives & additives and 95% destruction efficiency of the afterburner.
- ii. The above limitations were established in construction permits #93070070, #94050012, and #99110048 pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that construction addressed in the aforementioned permits does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203.
- iii. The VOM emissions from heatset web offset lithographic printing lines #20, #22, #23, and #27 shall be calculated using the formulas listed in Condition 8(j).
- f. The affected sheetfed lithographic printing lines shall not exceed the following limits:
  - i. Operation of the sheetfed lithographic printing lines shall not exceed the following limits:

Throughput of Printing Inks	
<u>(Tons/Hour)</u>	<u>(Tons/Year)</u>
0.22	80.3

- ii. VOM emissions from the sheetfed lithographic printing lines shall not exceed the following limits:

<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
1.05	10.5

These limits are based on 95% retention for coldest ink and maximum operation.

iii. The above limitations were established in Permit #02040028, pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203.

g. Emissions and operation of the inkjet label printing system shall not exceed the following limits

<u>Ink &amp; Replenisher</u> <u>(Gallons/Month)</u>	<u>(Gallons/Year)</u>	<u>VOM Content</u> <u>(Lbs/Gallon)</u>	<u>VOM Emissions</u> <u>(Lbs/Month)</u>	<u>(Tons/Year)</u>
42	500	7.0	2.94	1.75

These limits are based on maximum operation, the maximum VOM content of the ink, and a material balance.

h. Operation and emission of the natural gas fired combustion equipment shall not exceed the following limits:

i. Natural Gas Usage: 40 mmscf/month, 400 mmscf/year.

ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lbs/mmscf)</u>	<u>Emissions</u> <u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Carbon Monoxide (CO)	84.0	1.68	16.80
Nitrogen Oxides (NO <sub>x</sub> )	100.0	2.00	20.00
Particulate Matter (PM)	7.6	0.15	1.52
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.01	0.12
Volatile Organic Material (VOM)	5.5	0.11	1.10

These limits are based on the maximum fuel usage and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

i. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from Press #21 and Press #28 shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.99 tons/month and 19.9 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this project not triggering the requirements of Section 112(g) of the Clean Air Act.

j. VOM and HAP emissions shall be calculated as follows:

i. Ink VOM and HAP Emissions (Ei):

$$E_i = C_i * (1 - R_i/100) * (1 - [(K/100) * (J_i/100)])$$

ii. Fountain Solution VOM or HAP Emissions (Ef):

$$E_f = C_f * (1 - [(K/100) * (J_f/100)])$$

iii. Manual Cleaning Solvent VOM or HAP Emissions (Em):

$$E_m = C_m * (1 - R_m/100)$$

iv. Automatic Cleaning Solvent VOM or HAP Emissions (Ea):

$$E_a = C_a * (1 - [(K/100) * (J_a/100)])$$

v. Other VOM or HAP Emissions (Eu):

$$E_u = C_u$$

vi. Total VOM or HAP Emissions (Et):

$$E_t = E_i + E_f + E_m + E_a + E_u$$

Where:

Ci = Ink VOM or HAP consumption (where consumption is the usage \* the VOM or HAP content);

Cf = Fountain solution VOM or HAP consumption;

Cm = Manual cleaning solvent VOM or HAP consumption;

Ca = Automatic cleaning solvent VOM or HAP consumption;

Cu = Other coating solvent VOM or HAP consumption;

Ri = Percent of ink VOM or HAP retained in printed product = 20, for heatset in, =95 for coldest ink.;

Rm = Percent of manual cleaning solvent VOM or HAP retained in cleaning wipes = 50 (used wipes shall be stored in closed containers);

Ru = Percent of UV coating VOM or HAP retained in printed product = 20;

K = Control efficiency of thermal oxidizer =0 if not controlled;

Ji = Capture efficiency of dryer and control system for ink VOM or HAP = 100;

Jf = Capture efficiency of dryer and control system for fountain solution VOM or HAP = 70;

Ja = Capture efficiency of dryer and control system for automatic cleaning solvent VOM or HAP = 40, 0 if not controlled;

Ju = Capture efficiency of dryer and control system for UV coating VOM or HAP = 100;

- k. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 9a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source of air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
  - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Conditions 10 and 11 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

10. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 11a. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.
  - b. Pursuant to 35 Ill. Adm. Code 218.409(a), testing to demonstrate compliance with requirements of 35 Ill. Adm. Code 218.407 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting such testing to allow the Illinois EPA to be present during such testing.
  - c. Pursuant to 35 Ill. Adm. Code 218.409(b), the methods and procedures of 35 Ill. Adm. Code 218.105(d) and (f) shall be used for testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1), as follows:
    - i. To select the sampling sites, Method 1 or 1A, as appropriate, 40 CFR 60, Appendix A. The sampling sites for determining efficiency in reducing VOM from the dryer exhaust shall be located between the dryer exhaust and the control device inlet, and between the outlet of the control device and the exhaust to the atmosphere;
    - ii. To determine the volumetric flow rate of the exhaust stream, Method 2, 2A, 2C, or 2D, as appropriate, 40 CFR 60, Appendix A;
    - iii. To determine the VOM concentration of the exhaust stream entering and exiting the control device, Method 25 or 25A, as appropriate, 40 CFR 60, Appendix A. For thermal and catalytic afterburners, Method 25 must be used except under the following circumstances, in which case Method 25A must be used:
      - A. The allowable outlet concentration of VOM from the control device is less than 50 ppmv, as carbon;
      - B. The VOM concentration at the inlet of the control device and the required level of control result in exhaust concentrations of VOM of 50 ppmv, or less, as carbon; and

- C. Due to the high efficiency of the control device, the anticipated VOM concentration at the control device exhaust is 50 ppmv or less, as carbon, regardless of inlet concentration. If the source elects to use Method 25A under this option, the exhaust VOM concentration must be 50 ppmv or less, as carbon, and the required destruction efficiency must be met for the source to have demonstrated compliance. If the Method 25A test results show that the required destruction efficiency apparently has been met, but the exhaust concentration is above 50 ppmv, as carbon, a retest is required. The retest shall be conducted using either Method 25 or Method 25A. If the retest is conducted using Method 25A and the test results again show that the required destruction efficiency apparently has been met, but the exhaust concentration is above 50 ppmv, as carbon, the source must retest using Method 25;
- iv. Notwithstanding the criteria or requirements in Method 25 which specifies a minimum probe temperature of 129°C (265°F), the probe must be heated to at least the gas stream temperature of the dryer exhaust, typically close to 176.7°C (350°F);
- v. During testing, the printing line(s) shall be operated at representative operating conditions and flow rates; and
- vi. During testing, an air flow direction indicating device, such as a smoke stick, shall be used to demonstrate 100 percent emissions capture efficiency for the dryer in accordance with 35 Ill. Adm. Code 218.407(a)(1)(B).
- d. Pursuant to 35 Ill. Adm. Code 218.409(c), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), (a)(3) and (a)(4)(A), and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of 35 Ill. Adm. Code 218.411(a)(1)(B)), shall be conducted upon request of the Illinois EPA, as follows:
  - i. The applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) shall be used; provided, however, Method 24, shall be used to demonstrate compliance; or
  - ii. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a); provided, however, Method 24 shall be used to determine compliance.
- e. Pursuant to 35 Ill. Adm. Code 218.409(e), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in

accordance with the applicable methods and procedures specified in 35 Ill. Adm. 218.110.

- 12a. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(A)(i), an owner or operator that uses an afterburner or carbon adsorber to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the control device is in use except as provided in 35 Ill. Adm. Code 218.105(d)(3). The continuous monitoring equipment must monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner.
- b. Pursuant to 35 Ill. Adm. Code 218.410(a), Fountain Solution Temperature:
  - i. The owner or operator of any lithographic printing line(s) relying on the temperature of the fountain solution to demonstrate compliance shall install, maintain, and continuously operate a temperature monitor of the fountain solution in the reservoir or fountain tray, as applicable.
  - ii. The temperature monitor must be capable of reading with an accuracy of 1°C or 2°C, 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 once every two operating hours. The automatic, continuous recording device shall be repaired or replaced as soon as practicable.
- c. Pursuant to 35 Ill. Adm. Code 218.410(b), Fountain Solution VOM Content. The owner or operator of any lithographic printing line(s) subject to 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2) or (a)(3) shall:
  - i. For a fountain solution to which VOM is not added automatically:
    - A. Maintain records of the VOM content of the fountain solution in accordance with 35 Ill. Adm. Code 218.411(c)(2)(C); or
    - B. Take a sample of the as-applied fountain solution from the fountain tray or reservoir, as applicable, each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution in the fountain tray or reservoir, and shall determine compliance with the VOM content limitation of the as-applied fountain solution by using one of the following options:

- I. With a refractometer or hydrometer with a visual, analog, or digital readout and with an accuracy of 0.5 percent. The refractometer or hydrometer must be calibrated with a standard solution for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications, against measurements performed to determine compliance. The refractometer or hydrometer must be corrected for temperature at least once per 8-hour shift or once per batch of fountain solution prepared or modified, whichever is longer; or
  - II. With a conductivity meter if it is demonstrated that a refractometer and hydrometer cannot distinguish between compliant and noncompliant fountain solution for the type and amount of VOM in the fountain solution. A source may use a conductivity meter if it demonstrates that both hydrometers and refractometers fail to provide significantly different measurements for standard solutions containing 95 percent, 100 percent and 105 percent of the applicable VOM content limit. The conductivity meter reading for the fountain solution must be referenced to the conductivity of the incoming water. A standard solution shall be used to calibrate the conductivity meter for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications;
    - ii. For fountain solutions to which VOM is added at the source with automatic feed equipment, determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level. Records must be retained of the VOM content of the fountain solution in accordance with 35 Ill. Adm. Code 218.411(c)(2)(D). The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications.
- d. Pursuant to 35 Ill. Adm. Code 218.410(c), if an afterburner is used to demonstrate compliance, the owner or operator of a heatset web offset lithographic printing line subject to 35 Ill. Adm. Code 218.407(a)(1)(C) shall:
- i. Install, calibrate, maintain, and operate temperature monitoring device(s) with an accuracy of 3°C or 5°F on the afterburner in accordance with 35 Ill. Adm. Code 218.105(d)(2) and in accordance with the manufacturer's specifications. Monitoring shall be performed at all times when the afterburner is operating; and
  - ii. Install, calibrate, operate and maintain, in accordance with the manufacturer's specifications, a continuous recorder on the

temperature monitoring device(s), such as a strip chart, recorder or computer, with at least the same accuracy as the temperature monitor.

- e. Pursuant to 35 Ill. Adm. Code 218.410(e), Cleaning Solution:
  - i. The owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with 35 Ill. Adm. Code 218.407(a)(4)(A) must:
    - A. For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):
      - I. 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 the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with 35 Ill. Adm. Code 218.407(a)(4)(A).
    - B. For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) as set forth in 35 Ill. Adm. Code 218.411(d)(2).
  - ii. The owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with 35 Ill. Adm. Code 218.407(a)(4)(B) must keep records for such cleaning solutions used on any such line(s) as set forth in 35 Ill. Adm. Code 218.411(d)(2)(C).
- 13. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis

(or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

14. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 15a. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to 35 Ill. Adm. Code 218.204 and complying by means of 35 Ill. Adm. Code 218.204 shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating as applied on each coating line.
  - 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 Ill. Adm. Code 218.411(b)(3), an owner or operator of a heatset web offset lithographic printing line(s) subject to the control requirements of 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1) shall collect and record daily the following information for each heatset web offset lithographic printing line subject to 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1):
  - i. Afterburner or other approved control device monitoring data in accordance with 35 Ill. Adm. Code 218.410(c) or (d), as applicable;
  - ii. A log of operating time for the afterburner or other approved control device, monitoring equipment, and the associated printing line;
  - iii. A maintenance log for the afterburner or other approved control device and monitoring equipment detailing all routine and non-routine maintenance performed, including dates and duration of any outages; and

iv. A log detailing checks on the air flow direction or air pressure of the dryer and press room to insure compliance with the requirements of 35 Ill. Adm. Code 218.407(a)(1)(B) at least once per 24-hour period while the line is operating.

c. Pursuant to 35 Ill. Adm. Code 218.411(c)(2), an owner or operator of a lithographic printing line subject to 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), or (a)(3), shall collect and record the following information for each fountain solution:

i. The name and identification of each batch of fountain solution prepared for use on one or more lithographic printing lines, the lithographic printing line(s) or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch;

ii. If an owner or operator uses a hydrometer, refractometer, or conductivity meter, pursuant to 35 Ill. Adm. Code 218.410(b)(1)(B), to demonstrate compliance with the applicable VOM content limit in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), or (a)(3):

A. The date and time of preparation and each subsequent modification of the batch;

B. The results of each measurement taken in accordance with 35 Ill. Adm. Code 218.410(b);

C. Documentation of the periodic calibration of the meter in accordance with the manufacturer's specifications, including date and time of calibration, personnel conducting, identity of standard solution, and resultant reading; and

D. Documentation of the periodic temperature adjustment of the meter, including date and time of adjustment, personnel conducting and results.

iii. If the VOM content of the fountain solution is determined pursuant to 35 Ill. Adm. Code 218.410(b)(1)(A), for each batch of as-applied fountain solution:

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;

C. Calculated VOM content of the as-applied fountain solution; and

- D. Any other information necessary to demonstrate compliance with the applicable VOM content limits in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2) and (a)(3).
- iv. If the VOM content of the fountain solution is determined pursuant to 35 Ill. Adm. Code 218.410(b)(2), for each setting:
    - A. VOM content limit corresponding to each setting;
    - B. Date and time of initial setting and each subsequent setting;
    - C. Documentation of the periodic calibration of the automatic feed equipment in accordance with the manufacturer's specifications; and
    - D. Any other information necessary to demonstrate compliance with the applicable VOM content limits in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2) and (a)(3).
  - v. If the owner or operator relies on the temperature of the fountain solution to comply with the requirements in 35 Ill. Adm. Code 218.407(a)(1)(A)(ii) or (a)(3)(B):
    - A. The temperature of the fountain solution at each printing line, as monitored in accordance with 35 Ill. Adm. Code 218.410(a); and
    - B. A maintenance log for the temperature monitoring devices and automatic, continuous temperature recorders detailing all routine and non-routine maintenance performed, including dates and duration of any outages;
- d. Pursuant to 35 Ill. Adm. Code 218.411(d)(2), for lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of 35 Ill. Adm. Code 218.407 shall collect and record the following information for each cleaning solution used on each lithographic printing line:
    - i. For each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 Ill. Adm. Code 218.407(a)(4)(A) and which is prepared at the source with automatic equipment:
      - A. The name and identification of each cleaning solution;
      - B. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(c);
      - C. Each change to 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; and
  - F. A calibration log for the automatic equipment, detailing periodic checks.
- ii. For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 Ill. Adm. Code 218.407(a)(4)(A), and which is not prepared at the source with automatic equipment:
- A. The name and identification of each cleaning solution;
  - B. Date and time of preparation, and each subsequent modification, of the batch;
  - C. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(c);
  - 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 calculations.
- iii. For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with 35 Ill. Adm. Code 218.407(a)(4)(B):
- 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 35 Ill. Adm. Code 218.409(e);
  - D. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and

- E. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(e).
  - iv. The date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any.
- 16a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Records addressing use of good operating practices for the oxidizers:
    - A. Records for periodic inspection of oxidizers with date, individual performing the inspection, and nature of inspection; and
    - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
  - ii. VOM contents of inks, cleaning solutions, coatings and other VOM containing materials (% by weight);
  - iii. Monthly and annual usages of inks, cleaning solutions, fountain solutions and other VOM containing materials (lbs/month and tons/year);
  - iv. HAP content of the materials used (% by weight);
  - v. Certified amount of waste shipped off site (tons/month and tons/year);
  - vi. Certified VOM and HAP content of the waste (weight %);
  - vii. Natural gas usage (mmscf/month and mmscf/year); and
  - viii. Monthly and annual CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM, and HAP emissions with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

17. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 18a. Pursuant to 35 Ill. Adm. Code 218.211(c)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 and complying by means of 35 Ill. Adm. Code 218.204 shall notify the Illinois EPA in the following instances:
  - i. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
  - ii. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1), respectively. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) or (e), respectively.
- b. Pursuant to 35 Ill. Adm. Code 218.411(b)(2), if testing of the afterburner or other approved control device is conducted pursuant to 35 Ill. Adm. Code 218.409(b), the owner or operator shall, within 90 days after conducting such testing, submit a copy of all test results to the Illinois EPA and shall submit a certification to the Illinois EPA that includes the following:
  - i. A declaration that all tests and calculations necessary to demonstrate whether the lithographic printing line(s) is in compliance with 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1), as applicable, have been properly performed;
  - ii. A statement whether the lithographic printing line(s) is or is not in compliance with 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1), as applicable; and
  - iii. The operating parameters of the afterburner or other approved control device during testing, as monitored in accordance with 35 Ill. Adm. Code 218.410(c) or (d), as applicable.
- c. Pursuant to 35 Ill. Adm. Code 218.411(c), an owner or operator of a lithographic printing line subject to of 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), or (a)(3), shall:

- i. Notify the Illinois EPA in writing of any violation of 35 Ill. Adm. Code 218.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation; and
  - ii. If changing its method of demonstrating compliance with the applicable VOM content limitations in 35 Ill. Adm. Code 218.407, or changing the method of demonstrating compliance with the VOM content limitations for fountain solutions pursuant to 35 Ill. Adm. Code 218.409, certify compliance for such new method in accordance with 35 Ill. Adm. Code 218.411(c)(1), within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing line(s) will be in compliance with the applicable requirements of 35 Ill. Adm. Code 218.407(a).
- d. Pursuant to 35 Ill. Adm. Code 218.411(d), for lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of 35 Ill. Adm. Code 218.407 shall:
- i. Notify the Illinois EPA in writing of any violation of 35 Ill. Adm. Code 218.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation; and
  - ii. If changing its method of demonstrating compliance with the requirements of 35 Ill. Adm. Code 218.407(a)(4), or changing between automatic and manual methods of preparing cleaning solutions, certify compliance for such new method in accordance with 35 Ill. Adm. Code 218.411(d)(1), within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing line(s) will be in compliance with the applicable requirements of 35 Ill. Adm. Code 218.407(a)(4).
- 19a. If there is an exceedance of or deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:
- Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

If you have any questions on this, please call David Hulskotter at 217/782-2113.

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

ECB:DWH:psj

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the source operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, (e.g., 100 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for any combination of such HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)						
	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>	<u>Single HAP</u>	<u>Total HAPs</u>
Heatset Printing Line 20					6.56		
Heatset Printing Line 21					5.20		
Heatset Printing Lines 22/23					13.12		
Heatset Printing Lines 24/26					11.50		
Heatset Printing Line 25					11.50		
Heatset Printing Line 27					5.33		
Heatset Printing Line 28					9.01		
Sheetfed Lithographic Printing Lines					10.50		
Inkjet Label System					1.75		
Natural Gas Fired Combustion Equipment	<u>16.80</u>	<u>20.00</u>	<u>1.52</u>	<u>0.12</u>	<u>1.10</u>	<u>-----</u>	<u>-----</u>
Totals	<u>16.80</u>	<u>20.00</u>	<u>1.52</u>	<u>0.12</u>	<u>75.57</u>	<u>7.9</u>	<u>19.9</u>

DWH:psj

Attachment B - Emissions Reduction Market System (ERMS)

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 reasonable further 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. 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 in the sources' permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable 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 transaction account to cover its actual VOM emissions during the preceding season. A transaction 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 transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction 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 Ill. Adm. Code 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 Ill. Adm. Code 205.500 and 35 Ill. Adm. Code 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" (ACMA) (35 Ill. Adm. Code 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 Ill. Adm. Code 205.630).

2. Applicability

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

3. Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 Ill. Adm. Code 205.150(c)(1) and 35 Ill. Adm. Code 205.720, and as further addressed by Condition 8 of this Attachment, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of 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 5 of this Attachment.
  - i. VOM emissions from emission units that the Illinois EPA determines would qualify as insignificant activities under 35 Ill. Adm. Code 201.Subpart F if the source were a CAAPP source and for which a statement to this effect is contained in the FESOP for a participating or new participating source are exempt from the requirements of 35 Ill. Adm. Code Part 205, in accordance with 35 Ill. Adm. Code 205.220(b);
  - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit for sources permitted to operate during startup, malfunction or breakdown pursuant to 35 Ill. Adm. Code 201.262, in accordance with 35 Ill. Adm. Code 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 Ill. Adm. Code 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 Ill. Adm. Code 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Condition 8(b) of this Attachment, if applicable, in accordance with 35 Ill. Adm. Code 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 Ill. Adm. Code 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 Ill. Adm. Code Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal 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 of this permit.

4. Market Transactions

- 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 Ill. Adm. Code 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 Ill. Adm. Code 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 Ill. Adm. Code 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 Ill. Adm. Code 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

5. Emissions Excursion Compensation

Pursuant to 35 Ill. Adm. Code 205.720, if the source fails to hold ATUs in accordance with Condition 3 of this Attachment, 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 the 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 emissions 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 Ill. Adm. Code 205.720(c), within 15 days after 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. Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in 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 Ill. Adm. Code 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 Ill. Adm. Code 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 Ill. Adm. Code 205.750(a), and shall be submitted in accordance with the following:
- i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
- ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

7. Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 Ill. Adm. Code 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 35 Ill. Adm. Code 205.337;
- iv. If a source has experienced an emergency, as provided in 35 Ill. Adm. Code 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 Ill. Adm. Code

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 Ill. Adm. Code 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 Ill. Adm. Code 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 November 30 of each year, for the preceding seasonal allotment period.

8. Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 187 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 21.237 tons per season.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 Ill. Adm. Code 205.405, including units complying with MACT or using BAT, as identified in Condition 10 of this Attachment 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 3(a) of this Attachment 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

None

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 Ill. Adm. Code Part 205, including:

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

9. Recordkeeping for ERMS

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

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as recorded and as required by Condition 16(a)(viii) of this permit and Condition 6(a) of this Attachment; and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

10. Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 Ill. Adm. Code 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 Ill. Adm. Code 205.405(a)]:
  - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the Clean Air Act;
  - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
  - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 Ill. Adm. Code 205.405(a) and (c)]:

Fuel Combustion Emission Units

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 Ill. Adm. Code 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 Ill. Adm. Code 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 Ill. Adm. Code 205.405(b) and (c)]:

None