

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Reliable Packaging, Inc.
Attn: Robert Crary
7131 West 60th Street
Chicago, Illinois 60638

Application No.: 73032105

I.D. No.: 031600CUR

Applicant's Designation:

Date Received: August 31, 2000

Subject: Printing

Date Issued: January 25, 2001

Expiration Date: January 25, 2006

Location: 7131 West 60th Street, Chicago, 60638

This Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of three coldset web offset presses, three flexographic presses, and a gluing operation as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) emissions less than 25 tons/year, hazardous air pollutants (HAPs) less than 10 tons/year individual, and 25 tons/year combined). 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.
- 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. Operation of the printing presses shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Ink Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>	<u>(Wt. %)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
3 Coldset Web Offset Presses (Combined)	4,190	25.14	35.0	73.3	0.44
3 Flexographic Presses (Combined)	4,167	25.00	8.0	467	2.80

These limits define the potential emissions of the coldest web offset printing presses and are based on the actual emissions determined from maximum production capacity and maximum VOM content of the inks and fountain solution. The emissions from ink usage uses 95% ink VOM retained on the web and 5% ink VOM evaporated to the atmosphere.

- b. Fountain solution usage for the presses shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Fountain Solution Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>	<u>(Wt. %)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
3 Coldset Web Offset Presses (Combined)	467	2.80	100	333	2.00

These limits define the potential emissions of the flexographic printing presses and are based on the actual emissions determined from maximum production capacity and maximum VOM content of the inks.

- c. Glue usage for the gluing operation shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Glue Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>	<u>(Wt. %)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
Glue Machines (Combined for Entire Gluing Operation)					
i. Window Machine Gluer	2,500	15.00	50.0	1,250	7.50
ii. Packaging Gluers and Hot Melt Adhesives	667	4.00	50.0	333	2.00

These limits define the potential emissions of the gluing operation and are based on the actual emissions determined from maximum production capacity and maximum VOM content of the glues.

- d. Clean-up solvent and make ready solution usage shall not exceed the following limits:

<u>Cleanup and Make Ready Solution Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Wt. %)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
1,667	10.00	100	1,667	10.00

These limits define the potential emissions from the cleanup/make ready solution usage and are based on the actual emissions determined from maximum usage and maximum VOM content of the materials used.

- e. This permit is issued based on the combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) never exceeding 100 lbs/day, as determined in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B), before the application of capture systems and control devices.
- 3. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
 - 4. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
 - 5a. Within 30 days of written request from the Illinois EPA or USEPA the Permittee shall submit data on the volatile organic material content of representative inks, fountain solution and glues as applied, determined by laboratory analysis in accordance with the 35 Ill. Adm. Code Section 218.105.
 - b. The submitted data shall include the VOM content of the inks, fountain solution and glues, a justification of why these are representative, and a description of the sampling procedures and documentation for the analysis.
 - c. The Illinois EPA may provide additional time for the performance of this testing upon request from the Permittee which shows that it is not feasible to perform representative testing within 30 days.
 - 6a. The Permittee shall maintain monthly records of the following items:
 - i. Name and identification number of each ink as applied on each printing line and usage of all inks on each printing line (lbs/month and tons/year).
 - ii. Name and identification number of each fountain solution as applied and usage of all fountain solutions for the presses (lbs/month and tons/year).
 - iii. Name and identification number of each glue as applied for the gluing operations and usage of all glues (lbs/month and tons/year).
 - iv. Name and identification number of each cleanup/make ready solution and usage of all cleanup/make ready solutions (lbs/month and tons/year).

- v. Volatile organic material and hazardous air pollutant content of all inks, fountain solutions, glues, cleanup/make ready solutions used.
- vi. Volatile organic material and hazardous air pollutant emissions (lbs/month and tons/year). The volatile organic material emissions shall be calculated separately for the coldset web offset, flexographic, gluing operation, and cleanup/make ready solution usage. Annual VOM and HAP emissions shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
 - A. VOM emissions from the coldset web offset presses shall be calculated as follows:
$$\text{Ink Usage} \times \text{VOM Content} \times \text{Percent Evaporated}^* = \text{Emissions}$$

* 5% for coldset web offset presses.

$$\text{Fountain Solution Usage} \times \text{VOM Content} = \text{Emissions}$$
 - B. VOM emissions from the flexographic presses, gluing operation and cleanup/make ready solution usage shall be calculated as follows:
$$\text{Material Usage} \times \text{VOM Content} = \text{Emissions}$$
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three 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.
- 7. If there is an exceedance of 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. 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 violation and efforts to reduce emissions and future occurrences.
- 8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system 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

9. The Permittee shall submit the following additional information with the Annual Emission Report, due May 1st of each year:
 - a. Annual ink, fountain solution, glue and cleanup/make ready solvent usage.
 - b. VOM and HAP emissions from the prior calendar year.
10. Should any modifications at the source increase the total emissions of VOM or hazardous air pollutants to more than 25 tons/year, the Permittee shall be required to obtain a construction permit to justify the emission increase.

It should also be noted that the bailers and cyclone are exempt from state permitting requirements, pursuant to 35 Ill. Adm. Code 201.146(aa) and (jj), respectively.

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

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

DES:JPB:jar

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the printing plant 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 well below the levels, (i.e., VOM emissions less than 25 tons/year, HAP emissions less than 10 tons/year individual and 25 tons/year combined) 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.

1a. Emissions from the coldset web offset printing presses:

<u>Item</u>	<u>Usage</u> (Lb/Mo)(T/Yr)		<u>VOM Content</u> (Wt. %)	<u>VOM Emissions</u> (Lb/Mo) (T/Yr)	
Litho Inks	4,190	25.14	35.0	73.3	0.44
Fountain Solution	467	2.80	100	467	2.80

These limits define the potential emissions of the coldset web offset printing presses and are based on the actual emissions determined from maximum production capacity and maximum VOM content of the inks and fountain solution. The emissions from ink usage uses 95% ink VOM retained on the web and 5% ink VOM evaporated to the atmosphere.

- b. This permit is issued based on the combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) never exceeding 100 lbs/day, as determined in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B), before the application of capture systems and control devices.

2. Emissions from the flexographic printing presses:

<u>Item</u>	<u>Usage</u> (Lb/Mo)(T/Yr)		<u>VOM Content</u> (Wt. %)	<u>VOM Emissions</u> (Lb/Mo) (T/Yr)	
Flexo Inks	4,167	25.00	8.0	333	2.00

These limits define the potential emissions of the flexographic printing presses and are based on the actual emissions determined from maximum production capacity and maximum VOM content of the inks.

3. Emissions from the gluing operation:

<u>Item</u>	<u>Usage</u>		<u>VOM Content</u> (Wt. %)	<u>VOM Emissions</u>	
	(Lb/Mo)	(T/Yr)		(Lb/Mo)	(T/Yr)
<u>Glues</u>					
i. Window Machine Gluer	2,500	15.00	50.0	1,250	7.50
ii. Packaging Gluers and Hot Melt Adhesives	667	4.00	50.0	333	2.00

These limits define the potential emissions from the gluing operation and are based on the actual emissions determined from maximum production capacity and maximum VOM content of glues.

4. Emissions from the cleanup/make ready solutions:

<u>Item</u>	<u>Usage</u>		<u>VOM Content</u> (Wt. %)	<u>VOM Emissions</u>	
	(Lb/Mo)	(T/Yr)		(Lb/Mo)	(T/Yr)
Total Cleanup and Make Ready Material	1,667	10.00	100	1,667	10.00

These limits define the potential emissions from the cleanup/make ready solution usage and are based on the actual emissions determined from maximum usage and maximum VOM content of the materials used.

5. Emissions of hazardous air pollutants (HAP's):

<u>Item</u>	<u>HAP's Emissions</u>	
	(Tons/Mo)	(Tons/Yr)
Any Individual HAP	2.0	9.0
All HAP's	3.0	24.0

This general HAP emission limit is to restrict the source below major source HAP levels and provide operational flexibility.

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