217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

The Label Printers L.P.
Attn: George Tommasi
1710 - 1710 North Landmark Road
Aurora, Illinois 60506

Application No.: 08090042 I.D. No.: 089407ABB
Applicant's Designation: Date Received: September 22, 2008
Subject: Label Printing Facility
Date Issued: Expiration Date:
Location: 1700 - 1710 North Landmark Road, Aurora, Kane County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of eighteen (18) flexographic printing presses, five (5) letterpress printing presses and one offset digital press HP Indigo WS6600 pursuant to 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:

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 any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such 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 limit the emissions of VOM from the construction of new emission units and other modifications at the source, which occurred without first obtaining construction permit(s) between November 15, 1992 and June 15, 2005 (the period during which the Chicago area was classified as severe nonattainment for ozone), to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification.

iii. To establish federally enforceable production and operating limitations, which restrict the potential to emit of VOM from flexographic printing presses to less than 25 tons per year so that the source is not subject to the requirements of 35 Ill. Adm. Code 218.401 (Flexographic and Rotogravure Printing).

iv. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. 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. 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.

3a. Pursuant to 35 Ill. Adm. Code 218.204(c)(2)(B), 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 Paper 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. The emission limitations are as follows:

	(lb VOM/lb) solids applied	kg VOM/kg (lb VOM/lb) coatings applied	kg VOM/kg
All other paper coatings	0.40	(0.08)	

b. Pursuant to 35 Ill. Adm. Code 218.204(c)(3), the paper coating limitation set forth in 35 Ill. Adm. Code 218.204(c) shall not apply to any owner or operator of any paper coating line on which flexographic, rotogravure, lithographic, or letterpress printing is performed if the paper coating line complies with the applicable emissions limitations in 35 Ill. Adm. Code Part 218 Subpart H. In addition, on and after May

1, 2011, the paper coating limitation shall also not apply to coating performed on or in-line with any digital printing press.

c. 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, or 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.

4. This permit is issued based upon the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK. The flexographic printing presses operated at the facility are not wide-web flexographic printing presses, as defined in 40 CFR 63.822(a).

5a. Pursuant to 35 Ill. Adm. Code 218.187(a)(1), except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall not apply to all cleaning operations that use organic materials at sources that emit a total of less than 226.8 kg per calendar month (500 lbs per calendar month) of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;

b. Pursuant to 35 Ill. Adm. Code 218.187(a)(2)(B)(ii) and (iii), the following cleaning operations shall be exempt from the requirements of Ill. Adm. Code 218.187(b), (c), (d), (f), and (g): Lithographic printing and Letterpress printing.

c. This permit is issued based upon the flexographic printing presses at the source not being subject to the requirements of 35 Ill. Adm. Code 218.401, Flexographic and Rotogravure Printing. Pursuant to 35 Ill. Adm. Code 218.402(a)(2), the limitations of 35 Ill. Adm. Code 218.401 do not apply if the flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines) at the source have a combined potential to emit limited to less than 22.7 Mg (25 tons) of VOM per year.

d. This permit is issued based upon the lithographic printing press (offset digital press HP Indigo WS6600) not being subject to the requirements of 35 Ill. Adm. Code 218.407, Emission Limitations and Control Requirements for Lithographic Printing Lines. Pursuant to 35 Ill. Adm. Code 218.405(c)(2), the requirements in 35 Ill. Adm. Code

218.407(a)(1)(A) and (a)(2) through (a)(5) and all applicable provisions in 35 Ill. Adm. Code 218.409 through 218.411 shall not apply if 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 exceeded 6.8 kg/day (15 lbs/day), calculated in accordance with 35 Ill. Adm. Code 218.411(b)(1)(B), before the application of capture systems and control devices;

e. This permit is issued based upon the letterpress printing presses at the source not being subject to the requirements of 35 Ill. Adm. Code 218.413 through 218.216, Emission Limitations and Control Requirements for Letterpress Printing Lines. Pursuant to 35 Ill. Adm. Code 218.412(a)(2), the source is not subject to the requirements of 35 Ill. Adm. Code 218.412 through 218.216, if VOM emission from all letterpress printing lines at the source (including solvents used for cleanup operations associated with the letterpress printing lines) never exceeded 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment, calculated in accordance with 35 Ill. Adm. Code 218.417(b)(1)(B).

6. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

7a. The operations and combined VOM emissions from all printing operations at the source shall not exceed the following limits:

VOM Usage		VOM emissions	
(tons/mo)	(tons/yr)	(tons/mo)	(tons/yr)
2.0	20.0	2.0	20.0

VOM and HAP emissions from printing operations shall be determined from the following equation:

$E = [\Sigma(M_i \times C_i) - W \times C_w]$, where:

$E =$ VOM or HAP emissions (tons);

$M_i =$ Raw material usage (tons);

$C_i =$ VOM or HAP content of the raw material ((% by weight);

$W =$ Certified amount of waste shipped-off (tons);

C_w - Certified VOM or HAP content of the waste (% by weight).

b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and

22.5 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 source not triggering the requirements of Section 112(g) of the Clean Air Act.

c. Compliance with the annual limits 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 of total).

8a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(B), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in subsection 218.187(a)(1), shall on and after January 1, 2012, collect and record the following information each month for each cleaning operation, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2):

i. The name and identification of each VOM-containing cleaning solution as applied in each cleaning operation;

ii. The VOM content of each cleaning solution as applied in each cleaning operation;

iii. The weight of VOM per volume and the volume of each as-used cleaning solution; and

iv. The total monthly VOM emissions from cleaning operations at the source;

b. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), 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(c) shall collect and record 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 the coating lines.

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 the coating lines.

c. Pursuant to 35 Ill. Adm. Code 218.404(b)(2), the owner or operator of a printing line which is exempted from the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402 shall collect and record all of the following information each year for each printing line and maintain the information at the source for a period of three years:

i. The name and identification number of each coating and ink as applied on each printing line.

ii. The VOM content and the volume of each coating and ink as applied each year on each printing line.

d. Pursuant to 35 Ill. Adm. Code 218.411(b)(2)(B), an owner or operator of lithographic printing lines exempt from the limitations in 35 Ill. Adm. Code 218.407 because of the criteria in 35 Ill. Adm. Code 218.405(c)(2) shall maintain records of calculations that demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source do not equal or exceed 6.8 kg/day (15 lbs/day), before the use of capture systems and control devices, as follows:

i. To calculate daily emissions of VOM, the owner or operator shall determine the monthly emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) and divide this amount by the number of days during that calendar month that lithographic printing lines at the source were in operation;

ii. To determine the VOM content of the inks, fountain solution additives and cleaning solvents, the test methods and procedures set forth in 35 Ill. Adm. Code 218.409(c) shall be used;

iii. To determine VOM emissions from inks used on lithographic printing lines at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks except when using an impervious substrate, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate except when using an impervious substrate. For impervious substrates such as metal or plastic, no emission adjustment factor is used. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing lines; and

iv. To determine VOM emissions from cleaning solutions used on lithographic printing lines at the source, an emission adjustment factor of 0.50 shall be used in calculating emissions from used shop towels if the VOM composite vapor pressure of each associated cleaning solution is demonstrated to be less than 10 mmHg measured at 20°C (68°F) and the shop towels are kept in closed containers. For cleaning solutions with VOM composite vapor pressures of equal to or greater than 10 mmHg measured at 20°C (68°F) and for shop towels that are not kept in closed containers, no emission adjustment factor is used.

e. Pursuant to 35 Ill. Adm. Code 218.417(b)(1)(B), an owner or operator of a letterpress printing line exempt from any of the limitations of 35 Ill. Adm. Code 218.413 because of the criteria in Section 218.412(a)(2) shall maintain calculations that demonstrate that combined emissions of

VOM from all letterpress printing lines (including inks and solvents used for cleanup operations associated with the letterpress printing lines) at the source never equal or exceed 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment, as follows:

i. To calculate daily emissions of VOM, the owner or operator shall determine the monthly emissions of VOM from all letterpress printing lines at the source (including solvents used for cleanup operations associated with the letterpress printing lines) and divide this amount by the number of days during that calendar month that letterpress printing lines at the source were in operation;

ii. To determine the VOM content of the inks and cleaning solvents, the tests methods and procedures set forth in Section 218.415(c) of this Subpart shall be used;

iii. To determine VOM emissions from inks used on letterpress printing lines at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks except when using an impervious substrate, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate except when using an impervious substrate. For impervious substrates such as metal or plastic, no emission adjustment factor is used. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing lines; and

iv. To determine VOM emissions from cleaning solutions used on letterpress printing lines at the source, an emission adjustment factor of 0.50 shall be used in calculating emissions from used shop towels if the VOM composite vapor pressure of each associated cleaning solution is less than 10 mmHg measured at 20°C (68°F) and the shop towels are kept in closed containers. Otherwise, no retention factor is used;

10a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:

i. Amount of each material, which contains either VOM or HAP, used on printing presses (tons/month and tons/year);

ii. VOM and HAP content of each material containing VOM or HAP ((% by weight);

iii. Certified amount of waste shipped-off (tons/month and tons/year) and its VOM content (% by weight); and

iv. Monthly and annual VOM and HAP emissions from the source with supporting calculations (ton/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 storage device) 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.

11a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(C), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in subsection 218.187(a)(1), shall notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in subsection (a)(2) of this Section, ever equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment, within 30 days after the event occurs.

b. 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 of 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 occurance 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.

c. Pursuant to 35 Ill. Adm. Code 218.404(b)(3), any owner or operator of a printing line which is exempted from the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402 shall notify the Illinois EPA of any record showing that combined potential to emit of VOM from all flexographic and rotogravure printing lines at the source equals or exceeds 22.7 Mg (25 tons) of VOM in any calendar year, by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs.

d. Pursuant to 35 Ill. Adm. Code 218.411(b)(1)(E), on and after August 1, 2010, an owner or operator of lithographic printing lines exempt from the limitations in 35 Ill. Adm. Code 218.407 because of the criteria in 35 Ill. Adm. Code 218.405(c)(2), shall notify the Illinois EPA in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for

cleanup operations associated with the lithographic printing lines) at the source ever equal or exceed 6.8 kg/day (15 lbs/day), before the use of capture systems and control devices, within 30 days after the event occurs.

e. Pursuant to 35 Ill. Adm. Code 218.417(b)(2), an owner or operator of a letterpress printing line exempt from any of the limitations of 35 Ill. Adm. Code 218.413 because of the criteria in Section 218.412(a)(2), shall notify the Illinois EPA in writing if the combined emissions of VOM from all letterpress printing lines (including inks and solvents used for cleanup operations associated with the letterpress printing lines) at the source ever equal or exceed 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment, within 30 days after the event occurs.

12a. If there is an exceedance or a deviation 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 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 Valeriy Brodsky at 217/782-2113.

Robert W. Bernoteit
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

RWB:VJB:
cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the label printing facility 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/year for volatile organic material (VOM), 10 tons per year for a single HAP, and 25 tons per year for any combination of such HAP) 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.

	Emissions (tons/year)		
Process	VOM	Single HAP	Total HAP
Label Printing	20.0	9.0	22.5

VJB: