

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Packaging Personified, Inc.
Attn: Joseph Imburgia
246 Kehoe Boulevard
Carol Stream, Illinois 60188

Application No.: 02070012

I.D. No.: 043020ACJ

Applicant's Designation:

Date Received: July 2, 2002

Subject: Flexographic Presses

Date Issued: February 2, 2012

Expiration Date: February 2, 2017

Location: 246 Kehoe Boulevard, Carol Stream, DuPage County

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) water based ink flexographic printing presses (Press #1 and Press #2), three (3) solvent based ink flexographic printing presses (Press #5, Press #7 and Comexi press) controlled by a regenerative thermal oxidizer (RTO), associated cleaning operations, polyethylene extruders, dryers and natural gas fired space heaters (each less than 10 million Btu/hr) 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 of any combination of such HAPs). As a result, the source is excluded from the requirements 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 area source status under the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR Part 63 Subpart KK. This is accomplished through the establishment of federally enforceable production limitations on the usage of HAP at the facility, including materials used for source categories or purposes other than printing and publishing, to less than 10 tons/year for any individual HAP and 25 tons/year of any combination of such HAPs.
 - iii. 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 required of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System. The maximum emissions of this source, as limited by the conditions of the 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. The wide-web flexographic printing presses at this source are subject to a National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A and KK. The Illinois EPA is administering the NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 63.820(a)(2), each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated for which the owner or operator chooses to commit to and meets the criteria of 40 CFR 63.820(a)(2)(i) and (ii) for purposes of establishing the facility to be an area source of HAP with respect to 40 CFR 63 Subpart KK. A facility which establishes area source status through some other mechanism, as described in 40 CFR 63.820(a)(7), is not subject to the provisions of 40 CFR 63 Subpart KK.
 - i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
 - ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.
- c. Pursuant to 40 CFR 63.820(a)(3), each facility for which the owner or operator chooses to commit to and meets the criteria stated in 40 CFR 63.820(a)(2) shall be considered an area source, and is subject only to the provisions of 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).
- d. Pursuant to 40 CFR 63.820(a)(4), each facility for which the owner or operator commits to the conditions in 40 CFR 63.820(a)(2) may exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion).
- e. Pursuant to 40 CFR 63.820(a)(5), each facility for which the owner or operator commits to the conditions in 40 CFR 63.820(a)(2) to become an area source, but subsequently exceeds either of the thresholds in 40 CFR 63.820(a)(2) for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, each such facility would be subject to the

provisions of 40 CFR 63 Subpart KK as noted in 40 CFR 63.820(a)(1) and would no longer be eligible to use the provisions of 40 CFR 63.820(a)(2), even if in subsequent 12-month periods the facility uses less HAP than the thresholds in 40 CFR 63.820(a)(2).

- f. Pursuant to 40 CFR 63.820(a)(6), an owner or operator of an affected source subject to 40 CFR 63.820(a)(2) who chooses to no longer be subject to 40 CFR 63.820(a)(2) shall notify the Illinois EPA or USEPA of such change. If, by no longer being subject to 40 CFR 63.820(a)(2), the facility at which the affected source is located becomes a major source:
 - i. The owner or operator of an existing source must continue to comply with the HAP usage provisions of 40 CFR 63.820(a)(2) until the source is in compliance with all relevant requirements for existing affected sources under 40 CFR 63 Subpart KK;
 - ii. The owner or operator of a new source must continue to comply with the HAP usage provisions of 40 CFR 63.820(a)(2) until the source is in compliance with all relevant requirements for new affected sources under 40 CFR 63 Subpart KK.
- 3a. 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 212.321(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 218.301, 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 only apply to photochemically reactive material.

- b. Pursuant to 35 Ill. Adm. Code 218.401(a), no owner or operator of a subject flexographic packaging rotogravure or publication rotogravure printing line shall apply at any time any coating or ink unless the VOM content does not exceed the limitation specified in either 35 Ill. Adm. Code 218.401(a)(1) or (a)(2). Compliance with this 35 Ill. Adm. Code 218.401 must be demonstrated through the applicable coating or ink 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 218.404(c). As an alternative to compliance with 35 Ill. Adm. Code 218.401(a), a subject printing line may meet the requirements of 35 Ill. Adm. Code 218.401(b) or (c).
 - i. Forty percent VOM by volume of the coating and ink (minus water and any compounds which are specifically exempted from the definition of VOM); or
 - ii. Twenty-five percent VOM by volume of the volatile content in the coating and ink.
- c. Pursuant to 35 Ill. Adm. Code 218.401(c), no owner or operator of a subject flexographic, packaging rotogravure or publication rotogravure printing line equipped with a capture system and control device shall operate the subject printing line unless the owner or operator meets the requirements in 35 Ill. Adm. Code 218.401(c)(1), (c)(2), or (c)(3) and 35 Ill. Adm. Code 218.401(c)(4), (c)(5) and (c)(6) below:
 - i. An incineration system is used which reduces the captured VOM emissions by at least 90 percent by weight; and
 - ii. The printing line is equipped with a capture system and control device that provides an overall reduction in VOM emissions of at least 60 percent where a flexographic printing line is employed; and
 - iii. The control device is equipped with the applicable monitoring equipment specified in 35 Ill. Adm. Code 218.105(d)(2) and except as provided in 35 Ill. Adm. Code 218.105(d)(3), the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times the control device is in use; and
 - iv. The capture system and control device are operated at all times when the subject printing line is in operation. The owner or operator shall demonstrate compliance with 35 Ill. Adm. Code 218.401(c) by using the applicable capture system and control device test methods and procedures specified in 35 Ill. Adm. Code 218.105(c) through 35 Ill. Adm. Code 218.105(f) and by complying with the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.404(e).

- 6a. Pursuant to 35 Ill. Adm. Code 218.204(c), the paper coating limitation shall not apply to any owner or operator of any paper coating line on which flexographic or rotogravure printing is performed if the paper coating line complies with the emissions limitations in 35 Ill. Adm. Code 218.401.
- b. Pursuant to 35 Ill. Adm. Code 218.402(b), upon achieving compliance with this 35 Ill. Adm. Code 218 Subpart H, the flexographic and rotogravure printing lines are not required to meet 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302). Flexographic and rotogravure printing lines exempt from 35 Ill. Adm. Code 218 Subpart H are subject to 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302). Rotogravure or flexographic equipment used for both roll printing and paper coating is subject to 35 Ill. Adm. Code 218 Subpart H.
- c. Pursuant to 35 Ill. Adm. Code 218.187(a)(2)(B), cleaning operations for flexible package printing shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (f), and (g).
- 7a. 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.
- b. For the 2 controlled presses, the Permittee shall utilize a regenerative thermal oxidizer (RTO) and capture system that provides at least an overall reduction of VOM emissions of at least 94%. This limit is as requested by the Permittee and exceeds the requirements of 35 Ill. Adm. Code 218.401(c)(4)(C).
- c. The regenerative thermal oxidizer (RTO) shall be in operation at all times that Press 5 or Press 6 is in operation. The regenerative thermal oxidizer shall not be seasonally shut down as would be allowed in 35 Ill. Adm. Code 218.107.
- d. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the regenerative thermal oxidizer (RTO) such that the regenerative thermal oxidizer (RTO) is kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- e. The regenerative thermal oxidizer's combustion chamber 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. This temperature shall be maintained during operation.
- 8a. Emissions and operation of all printing shall not exceed the following limits:

VOM Usage

VOM Emissions

<u>Emission Unit</u>	<u>(lbs/Mo)</u>	<u>(Tons/Yr)</u>	<u>(lbs/Mo)</u>	<u>(Tons/Yr)</u>
Presses #1 and #2	400	2.00	400	2.00
Presses #5,#6 & #7	56,600	283.00	3,600	17.00
Cleanup and Other Solvents	980	4.90	980	4.90
			Total:	23.90

These limits are based on the maximum material usage at the maximum VOM content and an overall control efficiency of 94% for presses #5, #6 & #7. The above limitations were established in Construction Permit 06020062 and 11040013, pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that the construction/modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 Ill. Adm. Code Part 203.

- b. Emissions and operation of the space heaters, dryers and thermal oxidizer shall not exceed the following limits:

- i. The consumption of natural gas shall not exceed:

Natural Gas Usage	
<u>(mmscf/Month)</u>	<u>(mmscf/Year)</u>
20	200

- ii. Emissions from the combustion of natural gas shall not exceed:

<u>Pollutant</u>	Emission Factor		Emissions	
	<u>(Lbs/mmscf)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Yr)</u>
Nitrogen Oxide (NO _x)	100	1.0	10.0	10.0
Carbon Monoxide (CO)	84	0.84	8.4	8.4
Particulate Matter (PM)	7.6	0.08	0.76	0.76
Volatile Organic Material (VOM)	5.5	0.06	0.55	0.55
Sulfur Dioxide (SO ₂)	0.06	0.01	0.01	0.01

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

- c. This permit is issued based on negligible emissions of VOM from the polyethylene extruders. For this purpose, VOM emissions from the polyethylene extruders shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- d. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 0.9 tons/month and 9.0 ton/year of any single HAP or 1.99 tons/month and 19.9 tons/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.

- e. 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 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 9 and 10 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.
11. Pursuant to 35 Ill. Adm. Code 218.404(a), the VOM content of each coating and ink 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 218.404.

- 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 218.105(d)(2)(B), an owner or operator must install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of ± 1 percent of the temperature measured in degrees Celsius or $\pm 0.5^\circ$ C, whichever is greater.
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 40 CFR 63.829(d), the owner or operator of each facility which commits to the criteria of 40 CFR 63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

15. 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.
- 16a. Pursuant to 35 Ill. Adm. Code 218.404(c)(2), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(a) shall collect and record all of the following information each day 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 of each coating and ink as applied each day on each printing line.
- b. Pursuant to 35 Ill. Adm. Code 218.404(e)(2), any owner or operator of printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(c) shall collect and record all of the following information each day for each printing line and maintain the information at the source for a period of three years:
 - i. Control device monitoring data.
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated printing line.
 - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- 17a. 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 regenerative thermal oxidizer (RTO):
 - A. Records for periodic inspection of the regenerative thermal oxidizer (RTO) 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. Names and amounts of inks used (gallons/month and gallons/year);
 - iii. The VOM and HAP content of inks used, recorded separately for controlled and uncontrolled presses (lbs/gallon).

- iv. Names and amounts of solvents used for the ink dilution (gallons/month and gallons/year);
 - v. The VOM and HAP content of solvents used for the ink dilution (lbs/gallon);
 - vi. Names and amounts of solvents used for clean-up (gallons/month and gallons/year);
 - vii. The VOM and HAP content of solvents used for clean-up (lbs/gallon); and
 - viii. Monthly and annual VOM and HAP emissions from the source, 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.
18. Pursuant to 40 CFR 63.830(b)(6)(ii), each owner or operator of an affected source subject to 40 CFR 63 Subpart KK shall submit to the Illinois EPA or USEPA A summary report specified in 40 CFR 63.10(e)(3) shall be submitted on a semi-annual basis (i.e., once every 6-month period). These summary reports are required even if the affected source does not have any control devices or does not take the performance of any control devices into account in demonstrating compliance with the emission limitations in 40 CFR 63.824 or 40 CFR 63.825. In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i), the summary report shall include exceedances of either of the criteria of 40 CFR 63.820(a)(2).
19. 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.
- 20a. Pursuant to 35 Ill. Adm. Code 218.404(c)(3), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(a) shall notify the Illinois EPA in the following instances:
- i. Any record showing violation of 35 Ill. Adm. Code 218.401(a) 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 with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(a) to 35 Ill. Adm. Code 218.401(b) or (c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(d)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(a) to 35 Ill. Adm. Code 218.401(b) or (c), the owner or operator shall comply with the requirements of 35 Ill. Adm. Code 215.404(d) or (e), respectively.
- b. Pursuant to 35 Ill. Adm. Code 218.404(e)(3), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(c) shall notify the Illinois EPA in the following instances:
 - i. Any record showing violation of 35 Ill. Adm. Code 218.401(c) 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 with 35 Ill. Adm. Code 218.401(b) to 35 Ill. Adm. Code 218.401(c) or 35 Ill. Adm. Code 218.401(a) or (b), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(c)(1) or (d)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(c) to 35 Ill. Adm. Code 218.401(a) or (b), the owner or operator shall comply with the requirements of 35 Ill. Adm. Code 215.404(c) or (d), respectively.
- 21a. If there is an exceedance of or a 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:jws

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission 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 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>	<u>VOM</u>	E M I S S I O N S (Tons/Year)					<u>Single HAP</u>	<u>Total HAPs</u>
		<u>NO_x</u>	<u>CO</u>	<u>PM</u>	<u>SO₂</u>			
Flexographic Presses 1&2	2.00							
Flexographic Presses 5,6 & 7	17.00							
Cleanup & Other Solvents	4.90							
Extruders								
	0.44							
Space Heaters and RTO	<u>0.55</u>	<u>10.00</u>	<u>8.4</u>	<u>0.76</u>	<u>0.01</u>			
Plant-Wide Totals	24.89	10.00	8.4	0.76	0.01	9.0	19.9	