

Attention:

Printpack, Inc.
Attn: Todd Wiederhold
2800 Overlook Parkway
Atlanta, Georgia 30339

State of Illinois

CLEAN AIR ACT PERMIT
PROGRAM (CAAPP) PERMIT

Source:

PrintPack, Inc
1400 Abbott Drive
Elgin, Illinois 60123

I.D. No.: 089438ADW
Permit No.: 95090157

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/785-1705

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Type of Application: Renewal
Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 089438ADW
Permit No.: 95090157
Statement of Basis No.: 95090157-1310

Date Application Received: July 13, 2009
Date Issued: January 2, 2014

Expiration Date: January 2, 2019
Renewal Submittal Date: 9 Months Prior to January 2, 2019

Source Name: Printpack
Address: 1400 Abbott Drive
City: Elgin
County: Kane
ZIP Code: 60123

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact Wei Han at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

REP:MTR:WH:psj

cc: IEPA, Permit Section
IEPA, FOS, Region 1

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Section 1 - Source Information

1. Addresses

Source

Printpack, Inc.
1400 Abbott Drive
Elgin, Illinois 60123

Owner

Printpack, Inc.
2800 Overlook Parkway
Atlanta, Georgia 30339

Operator

Printpack, Inc.
1400 Abbott Drive
Elgin, Illinois 60123

Permittee

The Owner and Operator of the source as identified in this table.

2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	Micah Eller	Plant Manager
<i>Delegated Authority</i>	Todd Wiederhold	Director of Environmental Health and Safety

Other Contacts

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Donna McCoy	847-888-7150 ext 35247	dmccoy@printpack.com
<i>Technical Contact</i>	Steve Carpenter	404-460-7448	scarpenter@preintpack.com
<i>Correspondence</i>	Donna McCoy	847-888-7150 ext 35247	dmccoy@printpack.com
<i>Billing</i>	Donna McCoy	847-888-7150 ext 35247	dmccoy@printpack.com

3. Single Source

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
N/A	N/A	N/A

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Section 2 - General Permit Requirements

1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
 - i. An emergency occurred and the source can identify the cause(s) of the emergency.
 - ii. The source was at the time being properly operated.
 - iii. The source submitted notice of the emergency to the IEPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
 - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

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upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

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

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7) (o) (ii) of the Act]

c. Duty to Maintain Equipment

The source shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements. [Section 39.5(7) (a) of the Act]

d. Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under. [Section 39.5(7) (a) of the Act]

e. Duty to Pay Fees

- i. The source must pay fees to the IEPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7) (o) (vi) of the Act]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18) (f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18) (a) (ii) (A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18) (e) of the Act]

f. Obligation to Allow IEPA Surveillance

Pursuant to Sections 4(a), 39.5(7) (a), and 39.5(7) (p) (ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
 - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
 - B. As otherwise authorized by the Act.
- v. Enter and utilize any testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any environmentally related activity, discharge or emission at the source authorized by this permit. The Permittee must first approve the taking of pictures or use of video recordings when photographic or recording equipment is used.

g. Effect of Permit

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
 - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
 - B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.
 - C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.
 - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

4. Testing

- a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit.

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Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7) (a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission unit or 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 IEPA 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 IEPA, within 120 days of receipt of written request by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. 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 IEPA shall have the right to observe all aspects of such tests.
 - ii. **Testing by the IEPA:** The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7) (b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

b. Retention of Records

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

c. Availability of Records

- i. Pursuant to Section 39.5(7) (a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7) (a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of

requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
 - A. The identification of each term or condition of this permit that is the basis of the certification.
 - B. The compliance status.
 - C. Whether compliance was continuous or intermittent.
 - D. The method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the IEPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after October 30, 2013 (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

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- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR".
 - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN".
 - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

9. Reopening and Revising Permit

a. Permit Actions

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This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7) (o) (iii) of the Act]

b. Reopening and Revision

Pursuant to Section 39.5(15) (a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

Pursuant to Sections 39.5(5) (e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7) (o) (v) of the Act]

10. Emissions Trading Programs

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

11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5) (l) and (o) of the Act]
- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5) (n) of the Act]

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12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

Section 3 - Source Requirements

1. Applicable Requirements

Pursuant to Sections 39.5(7) (a), 39.5(7) (b), and 39.5(7) (d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.
- ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

b. Emissions Reduction Market System (ERMS)

Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS. The allotment of ATUs to this source is 610 ATUs per seasonal allotment period. The Permittee shall comply with all applicable requirements in Section 7.4 of this permit.

c. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), the Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.

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v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

d. Asbestos Demolition and Renovation

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or demolish pursuant to Condition 3.1(d)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.
- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

e. Future Emission Standards

Pursuant to Section 39.5(15) (a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

2. Applicable Plans and Programs

Pursuant to Sections 39.5(7) (a), 39.5(7) (b), and 39.5(7) (d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive PM Operating Program

Should this source become subject to 35 IAC 212.302, the Permittee shall prepare and operate under a Fugitive PM Operating Program consistent with 35 IAC 212.310 and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). Any future Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the Fugitive PM Operating Program is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Fugitive PM Operating Program. In the event that the IEPA notifies the Permittee of a deficiency with any Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7) (a) of the Act.

b. PM₁₀ Contingency Measure Plan

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM₁₀ Contingency Measure Plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The plan shall be submitted to IEPA for its review. Any future PM₁₀ Contingency Measure Plan made by the Permittee during the permit term is automatically incorporated by reference provided the PM₁₀ Contingency Measure Plan is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the PM₁₀ Contingency Measure Plan. In the event that the IEPA notifies the Permittee of a deficiency with any PM₁₀ Contingency Measure Plan, the Permittee shall be required to

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revise and resubmit the PM₁₀ Contingency Measure Plan within 30 days of receipt of notification to address the deficiency.

c. Episode Action Plan

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.
- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 60 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7) (a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on August 30, 2012, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO₂, PM₁₀, NO₂, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- v. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

d. Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a) (2) (i) and (ii).

3. Source Wide Requirements

a. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321(a), the Permittee shall not 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, to exceed the allowable emission rates specified in 35 IAC 212.321(c). (Also see Section 7.2(a) and 7.2(b))

ii. Compliance Method (PM Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to PM emissions:
 - I. A file containing the method used by the Permittee to determine emissions of PM, with supporting documentation.
 - II. The combined total plant wide fuel combustion emissions of PM including each printing line, laminator, and parts washer, in lbs/mo and tons/yr (12 month rolling average), updated quarterly, with supporting calculations.

4. Synthetic Minor Limits

a. i. HAP Requirements

- A. Pursuant to Construction Permit #09080036, the emission of HAPs from the source shall not exceed 8 tons/year for any individual HAP and 20 tons/year for all HAPs combined. [T1]

ii. Compliance Method (HAP Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(d) of the Act, 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 (running 12 month total).
- B. Pursuant to Section 39.5(7)(d) of the Act, the Permittee shall keep monthly and annual records of individual and total HAP emissions (tons/month and tons/year).

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 45 days of deviations from applicable requirements as follows:
 - I. Requirements in Conditions 3.1(a)(i), 3.1(c) and 3.1(d).
 - II. Requirements in Condition 3.2(c).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.

- B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

b. Semiannual Reporting

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	September 1
July through December	March 1

- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

Section 4 - Emission Unit Requirements

4.1 Rotogravure Printing Lines

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Printing Line P02 with 13.8 mmBtu/hr Natural Gas Dryer	SO ₂ , VOM, NO _x , CO	1990	None	PTE vented to RTO I03/I04	Thermocouples, Differential Pressure Transmitter
Printing Line P06 with 10.4 mmBtu/hr Natural Gas Dryer	SO ₂ , VOM, NO _x , CO	1994	None	PTE vented to RTO I03/I04	Thermocouples, Differential Pressure Transmitter
Printing Line P07 with 13.2 mmBtu/hr Natural Gas Dryer	SO ₂ , VOM, NO _x , CO	1997	None	PTE vented to RTO I03/I04	Thermocouples, Differential Pressure Transmitter
Printing Line P08 with 15.8 mmBtu/hr Natural Gas Dryer	SO ₂ , VOM, NO _x , CO	2010	None	PTE vented to RTO I03/I04	Thermocouples, Differential Pressure Transmitter
Printing Line P09 with 1.0 mmBtu/hr Natural Gas Dryer	SO ₂ , VOM, NO _x , CO	2010	None	PTE vented to RTO I03/I04	Thermocouples, Differential Pressure Transmitter

2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), the Permittee shall not 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.

ii. Periodic Monitoring Compliance Method (Opacity Requirements)

Monitoring Requirements

A. Pursuant to Section 39.5(7)(p) of the Act, the Permittee shall conduct annual visible emission observation for the stack of RTO I03 or I04 using Method 22. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shutdown of the printing lines and/or maintenance and repair. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any

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corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Sulfur Dioxide Requirements (SO₂)

A. Pursuant to 35 IAC 214.301, the Permittee shall not cause or allow the emission of sulfur dioxide into the atmosphere from any drying oven or afterburner to exceed 2000 ppm.

ii. Compliance Method (SO₂ Requirements)

See Condition 4.1.2(f) (ii) (D).

c. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to the noted permits, VOM usage and emissions from each printing line shall not exceed the following limits:

Emission Unit	VOM Usage		VOM Emissions		Permit
	tons/month	tons/year	tons/month	tons/year	
Printing Line P02	N/A	820	N/A	41	#89110045 #93090037
Printing Line P066	90	840	4.5	42	#89110045 #93090037
Printing Line P07	385 tons/mo* and 1,100 lbs/hr**	4,125*	7.7 tons/mo and 22 lbs/hr	82.5	#96120091
Printing Lines P08 & P09	120	1,200	2.4	24	#09080036

* After credits for materials sent offsite.

** Maximum press capability. Records not required to demonstrate compliance with limits.

B. Pursuant to 35 IAC 218.401(c)(6), the capture system and control device shall be operated at all times when the subject printing lines are in operation.

ii. Compliance Method (Operational and Production Requirements)

Monitoring

A. Pursuant to 35 IAC 218.401(c)(5), the control device of each printing line shall be equipped with applicable monitoring equipment specified in 35 IAC 218.105(d)(2). The monitoring equipment shall be calibrated, operated and maintained according to vendor specifications at all times the control device is in use.

Recordkeeping

B. Pursuant to 39.5(7)(b) of the Act, the Permittee shall maintain records of the following items for each printing line:

I. VOM content of inks and coatings and other materials used in the press.

II. Material usage (lb/day). For a multiday job, total material usage may be recorded on the day that the job is completed, and apportioned back to specific days.

III. VOM emissions (lb/mo and tons/yr).

d. i. **Carbon Monoxide Requirements (CO)**

A. Pursuant to Construction Permit #09080036, CO emissions from printing lines P08 and P09 and the RTO (I04) associated with combustion of natural gas, shall not exceed 10.0 tons/yr. [T1]

ii. **Compliance Method (CO Requirements)**

Recordkeeping

A. Pursuant to 39.5(7)(b) of the Act, the Permittee shall retain a file that contains the maximum firing rate of the burners on the press dryers of the printing lines P08 and P09 and RTO I04 in mmBtu/hr and the maximum emissions of CO in lb/mmBtu and tons/yr.

e. i. **Nitrogen Oxide Requirements (NO_x)**

A. Pursuant to Construction Permit #96120091, NO_x emissions from the dryer of P07 and the RTO (I03) associated with combustion of natural gas, shall not exceed 1.2 tons/mo and 12 tons/yr. [T1]

B. Pursuant to Construction Permit #09080036, NO_x emissions from printing lines P08 and P09 and the RTO (I04) associated with combustion of natural gas, shall not exceed 11.92 tons/yr. [T1]

ii. **Compliance Method (NO_x Requirements)**

Recordkeeping

A. Pursuant to 39.5(7)(b) of the Act, the Permittee shall retain a file that contains the maximum firing rate of the burners on the press dryers of the printing line P07 and RTO I03 in mmBtu/hr and the maximum emissions of NO_x in lb/mmBtu, tons/month and tons/yr.

B. Pursuant to 39.5(7)(b) of the Act, the Permittee shall retain a file that contains the maximum firing rate of the press dryers of the printing lines P08 & P09 and RTO I04 in mmBtu/hr and the maximum emissions of NO_x in lb/mmBtu and tons/yr.

f. i. **Operational and Control Requirements**

A. Pursuant to 39.5(7)(a), natural gas or propane shall be the only fuel fired in the afterburners and the dryers associated with the printing presses.

B. Pursuant to 39.5(7)(a) of the Act, the enclosure installed on the emission units listed in Condition 4.1.1 shall meet the PTE requirements established in 35 IAC 218 Appendix B Procedure T.

C. Pursuant to 39.5(7)(a) of the Act, the capture and control system I03/I04 shall be operated so that VOM emissions entering the system are reduced by 98%.

D. Pursuant CAAPP Permit #95090157 issued on April 12, 2005, if only printing line P06 or automatic parts washer PW02 are in operation, the afterburner

I03/04 destruction efficiency of VOM from P06 and PW02 shall achieve 95% on an hourly basis.

- E. Pursuant to 39.5(7)(b) of the Act, afterburner I03 and I04 shall be operated with a three hour average combustion chamber temperature of at least 1500°F or such lower temperature at which achievement of 99% destruction efficiency has been demonstrated by testing. The set point for the temperature controller may be 25°F higher to allow for fluctuations but achieve the three hour average. That is, a recorded temperature of 1525°F during a test will be considered 1500°F. Should the afterburner combustion chamber temperature drop below 1,350°F for a period of more than 15 minutes, operation of the emission units vented to the afterburner shall cease until the minimum required combustion operating temperature is reestablished.
- F. Pursuant to 35 IAC 218.401(d), the Permittee shall not cause or allow VOM containing cleaning materials, including used cleaning towels, associated with the subject rotogravure printing lines to be kept, stored, or disposed of in any manner other than in closed containers, or conveyed from one location to another in any manner other than in closed containers or pipes, except when specifically in use.

ii. Compliance Method (Operational and Control Requirements)

Monitoring

- A. Pursuant to 35 IAC 218.401(c)(6), the Permittee shall monitor the afterburners with continuous monitoring equipment which is calibrated, maintained, and operated according to vendor specifications at all times the control device is in use. The continuous monitoring equipment must monitor the combustion chamber temperature of regenerative thermal oxidizer I03 and I04.
- B. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the printing presses and their associated thermal oxidizers are subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.4 and Table 7.4.1, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

Testing

- C. Pursuant to Section 39.5(7)(b) of the Act, within 24 months after issuance of this permit, the Permittee shall test the destruction efficiency and overall control efficiency of the thermal oxidizer I03 and I04 by a qualified independent testing service using USEPA Reference Method 18, 25 or 25A, as appropriate.

Recordkeeping

- D. Record that the natural gas quality is equal to pipeline quality natural gas.
- E. Pursuant to 35 IAC 218.404(e)(2), the Permittee shall maintain records of the following items for the capture and control devices on a daily basis:
 - I. Control device monitoring data.

- II. A log of operating time for control devices and monitoring equipment, and running hours of production equipment listed in Table 4.1. RTO temperature charts or data logger records will serve as a log of monitoring equipment and control device operating time.
- III. A maintenance log for the capture system, control devices and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

g. i. Work Practice Requirements

- A. Pursuant to Construction Permit #96120091, annual natural gas usage by the dryer of P07 and RTO (I03) shall not exceed 240 million cubic feet. [T1]

Note: Compliance shall be documented per condition 4.1.2(e)(ii)(A). The annual natural gas usage limit was based on the maximum potential emissions with the burners operating at the maximum fire rating for 8760 hours per year. The Permittee is not required to record gas usage for individual units.
- B. Pursuant to Construction Permit #09080036, the maximum combined firing rate of the dryers associated with printing lines P08 and P09 and the burners in the RTO (I04) shall not exceed 27.2 mmBtu/hr. [T1]
- C. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the printing lines in a manner consistent with good air pollution control practice for minimizing emissions.

ii. Periodic Monitoring Compliance Method (Work Practice Requirements)

Monitoring Requirements

- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform quarterly inspections of the emission units listed in Section 4.1.1 and the emission control devices. Routine maintenance constitutes inspections.

Recordkeeping Requirements

- B. Pursuant to 39.5(7)(b) of the Act, the Permittee shall record the annual natural gas usage by the dryer of P07 and RTO (I03) (mmscf/yr).
- C. Pursuant to 39.5(7)(b) of the Act, the Permittee shall retain a file that contains the maximum firing rate of the press dryers on printing line P08 and P09, and RTO (I04) (mmBtu/hr).
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log for the equipment listed in Section 4.1.1. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

- a. The rotogravure printing lines are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for the Printing and Publishing Industry, 40 CFR Part 63 Subpart KK, because the source is not a major source of HAPs.

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- b. Pursuant to 35 IAC 218.402(c), the rotogravure printing lines are not subject to 35 IAC 218 Subpart G (35 IAC 218.301 or 302).
- c. The drying ovens are not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, or 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Units, because the drying ovens are not by definition fuel combustion emission unit.
- d. The rotogravure printing lines are not subject to 40 CFR 60 Subpart QQ because the rotogravure printing lines are classified as "packaging" rotogravure. Subpart QQ only applies to "publication" rotogravure.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 45 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), 4.1.2(c)(i), 4.1.2(d)(i), 4.1.2(e)(i), 4.1.2(f)(i), and 4.1.2(g)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.2 Laminators

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Extrusion Laminator L33/34 with 5.3 mmBtu/hr Natural Gas Dryer	SO ₂ , VOM	1987	None	None	None
Adhesive Laminator L35/36 with 3.5 mmBtu/hr Natural Gas Overhead Oven	SO ₂ , VOM	2004	None	PTE Vented to RTO I03/I04*	Thermocouples, Differential Pressure Transmitter

* See Section 4.1 for monitoring, testing and recordkeeping requirements for emission control devices I03/I04.

2. Applicable Requirements

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7) (a), 39.5(7) (b), and 39.5(7) (d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), the Permittee shall not 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.

ii. Periodic Monitoring Compliance Method (Opacity Requirements)

Monitoring Requirements

A. Pursuant to Sections 39.5(7) (b) and (d) of the Act, at a minimum, the Permittee shall perform observations annually for opacity on laminators in accordance with Method 9. The initial Method 9 testing shall first be conducted within one year after this condition becomes effective.

Recordkeeping

B. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, and the findings of the observation including the opacity values obtained from the Method 9 observation.

b. i. Sulfur Dioxide Requirements (SO₂)

A. Pursuant to 35 IAC 214.301, the Permittee shall not cause or allow the emission of sulfur dioxide into the atmosphere from the dryers or afterburners to exceed 2000 ppm.

ii. Compliance Method (SO₂ Requirements)

Recordkeeping

A. Record that the natural gas quality is equal to pipeline quality natural gas as required by Condition 4.1.2(f) (ii) (D).

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c. i. Volatile Organic Material Requirements (VOM)

- A. The Permittee shall comply with one of the following limits for the coatings used by laminator L33/34:
- i. The VOM content shall not exceed 0.4 lb/lb solids or 0.08 lb/lb coatings (35 IAC 218.204(c)(2)); or
 - ii. The daily weighted average of VOM content shall not exceed 0.4 lb/lb solids or 0.08 lb/lb coatings (35 IAC 218.205(a)).
- B. Pursuant to the noted permits, VOM usage and emissions from each laminator shall not exceed the following limits*:

Emission Unit	VOM Usage		VOM Emissions		Permit
	Tons/Month	Tons/Year	Tons/Month	Tons/Year	
Laminator L33/34	N/A	38.6	4.0	38.6	#87040050
Laminator L35/36	175	1,400	3.5	28.0	#03040059

* This permit is issued based on methylene diphenyl diisocyanate (MDI) present in certain adhesives being fully reactive. Accordingly, MDI is excluded from usage records and VOM emissions of laminator since it contributes negligible emissions of VOM.

ii. Compliance Method (Operational and Production Requirements)

Monitoring

- A. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, laminator L35/36 and its associated thermal oxidizers are subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.4 and Table 7.4.1, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

Recordkeeping

- B. Pursuant to 39.5(7)(b) of the Act, the Permittee shall maintain records of the following items for each laminator:
- I. The name and identification number of each VOM containing material used, including ink, coatings, adhesives, and solvent.
 - II. Daily-weighted average VOM content of the primers or coatings used by L33/34, lbs VOM/lb solid or lb VOM/lb coating.
 - III. The VOM content of the coatings used by L33/34 through manufacturer certified data sheet, safety data sheets or equivalent.
 - IV. Daily usage of each VOM containing material as applied on each laminator (lb/day, tons/mo and tons/yr).
 - V. VOM emissions (tons/mo and tons/yr) with supporting calculations and documentation.
- C. Pursuant to 35 IAC 218.211(a), if not provided by material supplier or manufacturer through certified product data sheet, the VOM content of the

coatings used by L33/34 shall be determined by the applicable testing methods and procedures specified in 35 IAC 218.105.

- D. Pursuant to 39.5(7)(b) of the Act, the Permittee shall keep records documenting the efficiency of the capture system and control device used on L35/36.

d. i. **Operation and Control Requirements**

- A. Pursuant to 35 IAC 218.207(b)(1), the capture system and control device I03/04 shall provide 81 percent reduction in the overall emissions of VOM from L35/36 and the control device has a 90 percent efficiency.

ii. **Periodic Monitoring Compliance Method (Operation and Control Requirements)**

Period monitoring compliance methods is implemented through the operation and control requirements in Condition 4.1.2(f)(ii).

e. i. **Work Practice Requirements**

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the laminators in a manner consistent with good air pollution control practice for minimizing emissions.

ii. **Periodic Monitoring Compliance Method (Work Practice Requirements)**

Monitoring Requirements

- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform quarterly inspections of the emission units and the emission control devices. Routine maintenance constitutes inspections.

Recordkeeping Requirements

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log for the equipment listed in Section 4.2.1. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

- a. The Laminators are not subjected to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

Printpack, Inc.
I.D. No.: 089438ADW
Permit No.: 95090517

Date Received: 07/13/2009
Date Issued: 01/02/2014

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 45 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), 4.2.2(d)(i) and 4.2.2(e)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.3 Parts Washers

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures*</i>	<i>Monitoring Devices</i>
Parts Washer PW02	VOM	1990	None	PTE vented to RTO I03/I04	Thermocouples, Differential Pressure Transmitter
Parts Washer PW03	VOM	1997	None	PTE vented to RTO I03/I04	Thermocouples, Differential Pressure Transmitter
Treater TR1-4	Ozone	1997	None	Ozone Destruct System or Vented to RTO I03/I04	None

* See Section 4.1 for monitoring, testing and recordkeeping requirements for emission control devices I03/I04.

2. Applicable Requirements

For the emission units in Condition 4.3.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), the Permittee shall not 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.

ii. Periodic Monitoring Compliance Method (Opacity Requirements)

Monitoring Requirements

A. See Condition 4.1.2(a)(ii)(A).

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.182(c)(4), the vapor pressure of the cleaning solvent used by PW02 and PW03 shall be less than 56 mmHg (1.064 psi) measured at 20°C (68°F).

B. Pursuant to the noted permits, VOM usage and emissions from each parts washer shall not exceed the following limits:

Emission Unit	VOM Usage		VOM Emissions		Permit
	Tons/Month	Tons/Year	Tons/Month	Tons/Year	
Parts Washer PW02	N/A	N/A	N/A	4.4	#89110045
Parts Washer PW03	18.6	219	0.37	4.38	#96120091

ii. Compliance Method (Operational and Production Requirements)

Monitoring

- A. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, parts washers PW02 and PW03 and their associated thermal oxidizers are subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.4 and Table 7.4.1, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records of the reclaim solvent used for each parts washer. Reclaim solvents are generated from inks and solvents from the printing process that would otherwise be disposed but are instead recycled via distillation for reuse in cleaning.
- I. The amount of VOM used (tons/month).
 - II. The amount of VOM emissions (tons/month).
 - III. For any reclaim solvent mixture of solvents, the vapor pressure of that mixture, measured in mmHg at 20°C (68°F) and verified annually.
- C. Pursuant to 35 IAC 218.182(d)(2), the Permittee shall maintain records for solvents purchased and used in the parts washers that are not reclaim solvents.
- D. Pursuant to 35 IAC 218.182(d)(3), the Permittee shall maintain records documenting the use of good operating practices consistent with the equipment manufacturer's specifications for the parts washer and add-on control equipment. At a minimum these records shall include:
- I. Records for periodic inspection of the cold cleaning degreasers and add-on control equipment with date of inspection, individual performing the inspection, and nature of inspection.
 - II. Records for repair of malfunctions and breakdowns with identification and description of incident, date identified, date repaired, nature of repair, and the amount of VOM that escaped into the atmosphere as a result of the incident.
 - III. A daily log of operating time for the control device, monitoring equipment. RTO temperature charts or data logger records will serve as a log of monitoring equipment and control device operating time. All hours during which the parts washers listed in Section 4.3.1 operated while both RTOs I03 and I04 were offline shall be logged.

E. Pursuant to 35 IAC 218.182(e), all records required shall be retained for three years and shall be made available to IEPA upon request.

c. i. **Ozone Requirements**

- A. Pursuant to Construction Permit #96120091, the total ozone emissions, after controls, from four treaters shall not exceed 80 lbs/mo and 0.42 tons/yr. [T1]
- B. Pursuant to 39.5(7)(b) of the Act, the ozone destructor shall be operated at all time or the ozone shall be vented to emission control system I03/I04 when the treaters are in operation.
- C. The treaters shall be operated within the design rating of 20 kilowatts.

ii. **Compliance Method (Operational and Production Requirements)**

Recordkeeping

- A. Pursuant to 39.5(7)(b) of the Act, the Permittee shall keep record of ozone emission from each treater, lbs/hr and tons/yr, with supporting calculations.
- B. Pursuant to 39.5(7)(b) of the Act, the Permittee shall keep record of ozone emission control method, either by ozone destructor or through RTO I03/I04, when any treater is operated.
- C. Pursuant to 39.5(7)(b) of the Act, the Permittee shall keep record of the maximum rated capacity of each treater in kilowatts.

d. i. **Operation and Control Requirements**

- A. Pursuant to 35 IAC 218.182(c)(4), the capture system and control device I03/04 shall provides 95 percent reduction in the overall emissions of VOM from PW02 and PW03.

ii. **Periodic Monitoring Compliance Method (Operation and Control Requirements)**

Period monitoring compliance methods is implemented through the operation and control requirements in Condition 4.1.2(g)(ii).

e. i. **Work Practice Requirements**

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate parts washers in a manner consistent with good air pollution control practice for minimizing emissions.

ii. **Periodic Monitoring Compliance Method (Work Practice Requirements)**

Monitoring Requirements

- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform quarterly inspections of the emission units and the emission control devices. Routine maintenance constitutes inspections.
- B. Pursuant to 35 IAC 218.182(a), the Permittee shall meet the following requirements while operating the parts washers:
 - I. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere.

- II. The cover of the parts washer is closed when parts are not being handled.
- III. Parts are drained until dripping ceases.
- C. Pursuant to 35 IAC 218.182(b), the Permittee shall meet the following requirements before operating parts washers:
 - I. Each parts washer is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counter-weights or a powered system if:
 - 1. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38°C (100°F).
 - 2. The solvent is agitated.
 - 3. The solvent is heated above ambient room temperature.
 - II. Each parts washer is equipped with a device for draining cleaned parts. The drainage device shall be constructed so that parts are enclosed under the cover while draining unless:
 - 1. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F).
 - 2. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external.
 - III. Each parts washer is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F) or if the solvent is heated above 50°C (120°F) or its boiling point:
 - 1. A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or
 - 2. Any other equipment or system of equivalent emission control as approved by the Agency and further processed consistent with 35 IAC 218.108. Such a system may include a water cover, refrigerated chiller or carbon adsorber. Oxidizers I03/I04 are approved by the Agency as equivalent emission control for the parts washers.
 - IV. A permanent conspicuous label summarizing the operating procedure is affixed to parts washers.
 - V. If a solvent spray is used, each parts washers is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.

Recordkeeping Requirements

- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log for the equipment listed in Section 4.3.1. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all

maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

- a. The parts washers are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for the Halogenated Solvent Cleaning, 40 CFR Part 63 Subpart T, because the source does not use halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning agent.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 45 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Conditions 4.3.2(a)(i), 4.3.2(b)(i), 4.3.2(c)(i), 4.3.2(d)(i) and 4.3.2(e)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
- A. Date and time of the deviation.
- B. Emission unit(s) and/or operation involved.
- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

Section 5 - Additional Title I Requirements

This Section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this Section.

Section 6 - Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

This condition is reserved for insignificant activities as defined in 35 IAC 201.210 and 201.211 which are subject to specific standards promulgated pursuant Sections 111, 112, 165, or 173 of the Clean Air Act, see Sections 9.1(d) and 39.5(6)(a) of the Act. As of the date of issuance of this permit, there are no such insignificant activities present at the source.

2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Printing plate making.	1	35 IAC 201.210(a) (2)
Trim cyclone.	1	35 IAC 201.210(a) (3)
Roof top area heaters, dock door air curtains, hot water heater, space heater.	16	35 IAC 201.210(a) (4)
Adhesive mixing.	1	35 IAC 201.210(a) (9)
Underground storage tank.	1	35 IAC 201.210(a) (10)
Plastics roll seamers*.	5	35 IAC 201.211(a)
Corona treaters**.	8	35 IAC 201.211(a)

* Emissions from seamers 1-5 are considered insignificant activities pursuant to 35 IAC 201.211(a). The Permittee accepted a combined emission limit of 8.6 TPY VOM for these emissions units to avoid triggering New Source Review in conjunction with the installation of other equipment (Press P08 and Press P09) pursuant to Construction Permit #09080036.

** Two treaters are on L-31/L32/L33 respectively. One treater on P02 and P06. And four treaters on L35/L36 (TR5-8).

3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b) (1) through (28) as being present at the source. The source is not required to individually list the activities.

4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. Pursuant to 35 IAC 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 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 or 212.322 (see Conditions 7.2(a) and (b)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source

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or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.

- c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.
- d. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.
- e. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 218.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.
- f. Pursuant to 35 IAC 218.182, for each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 218.182, except as provided in 35 IAC 218.181.

5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed.
- b. Potential to emit emission calculations before any air pollution control device for each insignificant activity not categorically defined as an insignificant activity per 35 IAC 201.210.

6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. A construction permit is not required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):
 - A. A description of the emission unit including the function and expected operating schedule of the unit.
 - B. A description of any air pollution control equipment or control measures associated with the emission unit.
 - C. The emissions of regulated air pollutants in lb/hr and ton/yr.

- D. The means by which emissions were determined or estimated.
 - E. The estimated number of such emission units at the source.
 - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. A construction permit is not required. Addresses are included in Attachment 3.
 - iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any change made in Condition 6.6(a) above.

b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit. A construction permit is not required.

c. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required. A construction permit is not required.

Section 7 - Other Requirements

1. Testing

- a. Pursuant to Section 39.5(7) (a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
 - i. The name and identification of the emission unit(s) being tested.
 - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
 - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.
 - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
 - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
 - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:
 - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
 - ii. Notification of the actual date and expected time of testing, not previously communicated, shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.

- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:
- i. General information including emission unit(s) tested.
 - ii. A summary of results.
 - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
 - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - v. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vii. An explanation of any discrepancies among individual tests or anomalous data.
 - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
 - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
 - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

2. PM Process Weight Rate Requirements

a. New Process Emission Units - 35 IAC 212.321

New Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972. [35 IAC 212.321]

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM 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 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation: [35 IAC 212.321(b)]

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

Where:

P = Process weight rate (tons/hr)
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 tons/hr:

A = 2.54
B = 0.53

B. Process weight rates greater than or equal to 450 tons/hr:

A = 24.8
B = 0.16

iii. Limits for New Process Emission Units: [35 IAC 212.321(c)]

<u>P</u> <u>(tons/hr)</u>	<u>E</u> <u>(lbs/hr)</u>	<u>P</u> <u>(tons/hr)</u>	<u>E</u> <u>(lbs/hr)</u>
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

b. Existing Process Emission Units - 35 IAC 212.322

Existing Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972. [35 IAC 212.322]

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c). See Condition 7.2(b) (iii) below. [35 IAC 212.322(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.322(c) shall be determined by using the equation: [35 IAC 212.322(b)]

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

Where:

P = Process weight rate (tons/hr)
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 tons /hr:

A = 4.10
B = 0.67
C = 0

B. Process weight rates greater than or equal to 450 tons /hr:

A = 55.0
B = 0.11
C = -40.0

iii. Limits for Existing Process Emission Units [35 IAC 212.322(c)]:

<u>P</u> <u>(tons /hr)</u>	<u>E</u> <u>(lbs/hr)</u>	<u>P</u> <u>(tons /hr)</u>	<u>E</u> <u>(lbs/hr)</u>
0.05	0.55	25.00	35.40
0.10	0.87	30.00	40.00
0.2	1.40	35.00	41.30
0.30	1.83	40.00	42.50
0.40	2.22	45.00	43.60
0.50	2.58	50.00	44.60
0.75	3.38	100.00	51.20
1.00	4.10	150.00	55.40
2.00	6.52	200.00	58.60
3.00	8.56	250.00	61.00
4.00	10.40	300.00	63.10
5.00	12.00	350.00	64.90
10.00	19.20	400.00	66.20
15.00	25.20	450.00	67.70
20.00	30.50	500.00	69.00

3. Emissions Reduction Market System (ERMS) Requirements

- a. Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS.
- b. Obligation to Hold Allotment Trading Units (ATUs)
 - i. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 7.3(g), 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 7.3(d):
 - A. VOM emissions from insignificant emission units and activities as identified in Section 6 of this permit, in accordance with 35 IAC 205.220.
 - B. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 4 of this permit, in accordance with 35 IAC 205.225.
 - C. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).
 - D. Excess VOM emissions that are a consequence of an emergency as approved by the IEPA, pursuant to 35 IAC 205.750.
 - E. VOM emissions from certain new and modified emission units as addressed by Condition 7.3(g)(ii), if applicable, in accordance with 35 IAC 205.320(f).
 - ii. In accordance with 35 IAC 205.150(c)(2), notwithstanding the Condition 7.3(b)(i) above, if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its 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 in Section 4 of this permit.
- c. Market Transactions
 - i. As specified in 35 IAC 205.610(a), the source shall apply to the IEPA for and obtain authorization for a Transaction Account prior to conducting any market transactions.
 - ii. Pursuant to 35 IAC 205.610(b), the Permittee shall promptly submit to the IEPA any revisions to the information submitted for its Transaction Account.
 - iii. Pursuant to 35 IAC 205.620(a), the source shall have at least one account officer designated for its Transaction Account.
 - iv. 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 IEPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the IEPA for entry into the Transaction Account database.
- d. Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 7.3(b), it shall provide emissions excursion compensation in accordance with the following:

- i. Upon receipt of an Excursion Compensation Notice issued by the IEPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - A. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - B. 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.
- ii. If requested in accordance with paragraph 7.3(d)(iii) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the IEPA 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.
- iii. Pursuant to 35 IAC 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 IEPA, rather than purchased from the ACMA.

e. Quantification of Seasonal VOM Emissions

- i. Pursuant to 35 IAC 205.315(b), the methods and procedures specified in Sections 3 and 4 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:

No exceptions
- ii. In accordance with 35 IAC 205.750, the Permittee shall report emergency conditions at the source to the IEPA if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - A. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency.
 - B. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

f. Annual Account Reporting

- i. Pursuant to 35 IAC 205.300, 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 IEPA for the seasonal allotment period. This report shall include the following information:
 - A. Actual seasonal emissions of VOM from the source.
 - B. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations.
 - C. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337.

- D. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the IEPA.
 - E. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).
 - F. 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 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
 - ii. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.
- g. Allotment of ATUs to the Source
- i. A. The allotment of ATUs to this source is 610 ATUs per seasonal allotment period.
 - B. This allotment of ATUs reflects the IEPA's determination that the source's baseline emissions were 64.87 tons per season.
 - I. This determination includes the use of 1996 and 1997 as baseline seasons. This determination includes use of the 1997 season as a substitute for the 1994 or 1995 season due to non-representative conditions in this season, as allowed by 35 IAC 205.320(a)(2).
 - II. For the conversion of contingent ATUs into actual ATUs, the baseline years were 1999 and 2000.
 - C. 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 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 7.3(i) of this permit.
 - D. ATUs will be issued to the source's Transaction Account by the IEPA 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.
 - ii. Contingent Allotments for New or Modified Emission Units
None
 - iii. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - A. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630.
 - B. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720.
 - C. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

h. Recordkeeping for ERMS

Pursuant to 35 IAC 205.700(a), the Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS:

- i. Seasonal component of the Annual Emissions Report.
- ii. Information on actual VOM emissions, as specified in detail in Sections 3 and 4 of this permit and Condition 7.3(e) (i).
- iii. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

i. Exclusions from Further Reductions

- i. A. Pursuant to 35 IAC 205.405(a), VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following:
 - I. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA.
 - II. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines.
 - III. An emission unit for which a LAER demonstration has been approved by the IEPA on or after November 15, 1990.
- B. Pursuant to 35 IAC 205.405(a) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above:

None
- ii. A. Pursuant to 35 IAC 205.405(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 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT.
- B. Pursuant to 35 IAC 205.405(b) and (c), the source has demonstrated in its ERMS application and the IEPA 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:

P02, P06, PW02

4. Compliance Assurance Monitoring (CAM) Requirements

a. CAM Provisions

i. Proper Maintenance

Pursuant to 40 CFR 64.7(b), at all times, the source shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

ii. Continued Operation

Pursuant to 40 CFR 64.7(c), except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the source shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit (PSEU) is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The source shall use all the data collected during all other periods, while the PSEUs are in production, in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

iii. Response to Excursions or Exceedances

A. Pursuant to 40 CFR 64.7(d) (1), upon detecting an excursion or exceedance, the source shall restore operation of the PSEU (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

B. Pursuant to 40 CFR 64.7(d) (2), determination of whether the source has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device.

b. Monitoring - Monitoring

Pursuant to 40 CFR 64.7(a), the source shall comply with the monitoring requirements of the CAM Plans as described in 5 below, pursuant to 40 CFR Part 64 as submitted in the source's CAM plan application.

c. Monitoring - Recordkeeping

Pursuant to 40 CFR 64.9(b) (1), the source shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information related to the monitoring requirements established for CAM.

d. Monitoring - Reporting

Pursuant to Sections 39.5(7) (b) and (f) of the Act, the source shall submit the following reporting requirements:

i. Semiannual Reporting

As part of the required Semiannual Monitoring Reports, the source shall submit a CAM report including the following at a minimum:

- A. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken pursuant to 40 CFR 64.6(c) (3) and 64.9(a) (2) (i).
- B. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks pursuant to 40 CFR 64.6(c) (3) and 64.9(a) (2) (ii).

e. CAM Plans

The following tables contain the CAM Plans in this CAAPP permit:

Table	Emission Unit Section	PSEU Designation	Pollutant
7.4.1	4.1, 4.2 and 4.3	Rotogravure Presses, Laminators, Parts Washers, Treaters	VOM and Ozone

Table 7.4.1 - CAM Plan

Emission Unit Section:	4.1, 4.2 and 4.3	
PSEU Designation:	Rotogravure Presses, Laminators, Parts Washers and Treaters Vented to Regenerative Thermal Oxidizer I03 and I04.	
Pollutant:	VOM, Ozone	
Indicators:	#1: Combustion Chamber Temperature	#2: Pressure
General Criteria		
The Monitoring Approach Used to Measure the Indicators:	The regenerative thermal oxidizer system includes modulating burners that are controlled by the central chamber temperature reading. Burners fire if the combustion chamber temperature drops below a preset temperature limit and modulates closed if the temperature exceeds a preset limit. The appropriate monitoring parameter for the RTO is temperature of the combustion chamber.	All air within the Permanent Total Enclosure is exhausted to the oxidizer. The regenerative thermal oxidizer system fan speed is controlled by a variable frequency drive. A differential pressure transmitter measures pressure in the duct near the fan. The VFD speeds up or slows down as needed to maintain the duct pressure set point. The appropriate monitoring parameter for the PTE is the pressure within the duct as measured at the pressure transmitter.
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	The combustion chamber temperature oscillates around the 1500°F set point (typically + or -25°F) depending on the burner firing cycle. However, temperature is maintained at 1500°F (or alternate temperature per Condition 4.1.2(g) (i) (E)) as a three hour average. The circular chart representation of this control scheme is a curved line for the combustion chamber temperature with oscillation noise above and below the 1500°F line.	A pressure of - 1" W.C. or less shall be maintained in the main truck line to the I03/04 regenerative thermal oxidizer during press operation. Any sustained pressure recorded over periods of 15 minutes or more which is more than an average - 1" W.C. during press operation shall be considered an excursion.
Quality Improvement Plan (QIP) Threshold Levels:	A Quality Improvement Plan (QIP) shall be implemented if the duration of total excursions is greater than 10 percent of the operating time of presses and press/laminators.	A Quality Improvement Plan (QIP) shall be implemented if the duration of total excursions is greater than 10 percent of the operating time of presses and press/laminators.
Performance Criteria		
The Specifications for Obtaining Representative Data:	The thermocouples are located in the roof of the combustion chamber. The oxidizer manufacturer selected the location of the thermocouples.	The differential pressure transmitter is located in the duct near the system fan. The oxidizer manufacturer selected the location of the transmitter.
Verification Procedures to Confirm the Operational Status of the Monitoring:	Temperature charts and oxidizer panel are checked daily to verify proper operation of monitoring device and control equipment.	Pressure charts and oxidizer panel are checked daily to verify proper operation of monitoring device and control equipment.

<p>Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:</p>	<p>The temperature recorder shall be operated per manufacturer's recommendations. The temperature recorder shall be checked and calibrated annually per manufacturer's recommendations and be accurate to within a minimum of +/-2% of the measured temperature.</p>	<p>The chart recorder shall be operated per manufacturer's recommendations. The chart recorder shall be checked and calibrated annually per manufacturer's recommendations and be accurate to within a minimum of +/- 2% of the measured pressure.</p>
<p>The Monitoring Frequency:</p>	<p>Temperature readings shall be semi continuous at 1-minute intervals. Burner control for the oxidizer system is provided by a relay logic system that uses temperature readings of the oxidizer's combustion chamber temperature to adjust the burner setting.</p>	<p>Pressure readings shall be semi continuous at 1-minute intervals. VFD control for the oxidizer system is provided by a relay logic system that uses pressure readings of the inlet to adjust fan speed.</p>
<p>The Data Collection Procedures That Will Be Used:</p>	<p>Temperature circular charts are changed at least monthly. The plant environmental coordinator reviews the charts for unusual readings, gaps in data, and excursions then initiates action as appropriate.</p>	<p>Monitoring charts are changed monthly. The plant environmental coordinator reviews the charts for unusual reading, gaps in data, and excursions then initiates action as appropriate.</p>
<p>The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:</p>	<p>Temperature readings shall be semi continuous at 1-minute intervals. Any reading below 1,350°F for more than 15 minutes will be considered an excursion. Any reading of more than - 25°F below the required combustion chamber temperature per Condition 4.1.2(g) (i) (E) for more than 90 minutes will be considered an excursion.</p>	<p>Pressure readings shall be semi continuous at 1-minute intervals. Any sustained pressure recorded over periods of 15 minutes or more which is more than an average - 1" W.C. during press operation shall be considered an excursion.</p>

Section 8 - State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

<i>Pollutant</i>		<i>Tons/Year</i>
Volatile Organic Material	(VOM)	237.6
Sulfur Dioxide	(SO ₂)	0.23
Particulate Matter	(PM)	2.93
Nitrogen Oxides	(NO _x)	38.40
HAP, not included in VOM or PM	(HAP)	----
Total		279.1

Attachment 1 - List of Emission Units at This Source

<i>Section</i>	<i>Emission Units</i>	<i>Description</i>
4.1	Rotogravure Printing Press P02	Rotogravure printing line, 1990
4.1	Rotogravure Printing Press P06	Rotogravure printing line, 1994
4.1	Rotogravure Printing Press P07	Rotogravure printing line, 1997
4.1	Rotogravure Printing Press P08	Rotogravure printing line, 2011
4.1	Rotogravure Printing Press P09	Rotogravure printing line, 2011
4.2	Extrusion Laminator L33/34	Extrusion laminator, 1987
4.2	Adhesive Laminator L35/36	Solvent adhesive laminator, 2004
4.3	Parts Washer PW02	Automatic parts washer, 1990
4.3	Parts Washer PW03	Automatic Parts washer, 1997
4.3	Treater TR1-4	Treaters, 1997

Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
BTU	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO ₂	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EAF	Electric arc furnace
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Green house gas
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
HP	Horsepower
hr	Hour
H ₂ S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
KW	Kilowatts
LAER	Lowest Achievable Emission Rate
lb	Pound

Printpack, Inc.
I.D. No.: 089438ADW
Permit No.: 95090517

Date Received: 07/13/2009
Date Issued: 01/02/2014

m	Meter
MACT	Maximum Achievable Control Technology
mm	Million
mon	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

Attachment 3 - Contact and Reporting Addresses

<p style="text-align: center;">IEPA Compliance Section</p> <p style="text-align: center;">IEPA Stack Test Specialist</p> <p style="text-align: center;">IEPA Air Quality Planning Section</p> <p style="text-align: center;">IEPA Air Regional Field Operations Regional Office #1</p> <p style="text-align: center;">IEPA Regional Office #3</p> <p style="text-align: center;">IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p>
	<p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p>
	<p>Illinois EPA, Bureau of Air Regional Office #3 2009 Mall Street Collinsville, Illinois 62234</p> <p>Phone No.: 618/346-5120</p>
	<p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, Illinois 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p style="text-align: center;">USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604</p> <p>Phone No.: 312/353-2000</p>

Attachment 4 - Example Certification by a Responsible Official

SIGNATURE BLOCK	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))	
AUTHORIZED SIGNATURE:	
BY: _____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Printpack, Inc.
 I.D. No.: 089438ADW
 Permit No.: 95090517

Date Received: 07/13/2009
 Date Issued: 01/02/2014