

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Imageworks Manufacturing, Inc.
Attn: Mark A. Meyer
49 South Street
Park Forest, Illinois 60466

<u>Application No.:</u> 74030060	<u>I.D. No.:</u> 031111AAU
<u>Applicant's Designation:</u> SCREEN	<u>Date Received:</u> February 14, 2000
<u>Subject:</u> Lithographic and Silk Screen Printing	
<u>Date Issued:</u> August 4, 2000	<u>Expiration Date:</u> August 4, 2005
<u>Location:</u> 49 South Street, Park Forest	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a silk screen and sheetfed offset lithographic printing operation pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/yr of volatile organic material (VOM), 25 tons/yr of hazardous air pollutants (HAPs), or 10 tons/yr of any single HAP). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. This permit is issued based upon the lithographic printing press being exempt from the requirements of 35 Ill. Adm. Code Part 218, Subpart H: Printing and Publishing, Section 218.407: Emission and Control Requirements for Lithographic Printing Lines on and After March 15, 1996. This is consequence of the combined daily emission rate of volatile organic materials (VOM) from subject presses never exceeding an applicability threshold of 100 lb/day (including solvents used for cleanup operations associated with the lithographic printing line(s)) established by Section 218.405(d)(2) and determined in accordance with Section 218.411(a)(1)(B).
- b. This permit is issued based on emissions of volatile organic material

from each emission unit not exceeding 8 lb/hour pursuant to 35 Ill. Adm. Code 218.301.

- c. This permit is also issued based on emissions of VOM from all coating operations not exceeding 15 lb/day pursuant to 35 Ill. Adm. Code 218.208(a).

- 3a. Usage of raw materials and VOM emissions from printing, coating, and clean-up operations shall not exceed the following limits:

VOM Usage and Emissions	
<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
1.6	16

These limits are based on the maximum production capacity and usage of a wide variety of raw materials with maximum VOM content. Compliance with annual limits shall be determined on a running total of 12 months of data.

- b. This permit is issued based on emissions of cold cleaning operations not exceeding 8 lb/hr and 2 ton per year.
4. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
5. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
6. The cold cleaning degreaser shall be operated according to the requirements of 35 Ill. Adm. Code 218.182:
- a. Operating Procedures: No person shall operate a cold cleaning degreaser unless:
- 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 degreaser is closed when parts are not being handled; and
 - iii. Parts are drained until dripping ceases.
- b. Equipment Requirements: No person shall operate a cold cleaning degreaser unless:
- i. The degreaser 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:

- A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38EC (100EF);
 - B. The solvent is agitated; or
 - C. The solvent is heated above ambient room temperature.
- ii. The degreaser 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:
- A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38EC (100EF); or
 - B. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external.
- iii. The degreaser 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 38EC (100EF) or if the solvent is heated above 50EC (120EF) or its boiling point:
- A. A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), which ever is less; or
 - B. Any other equipment or system of equivalent emission control as approved by the Illinois EPA and further processed consistent with Section 218.108 of this Part. Such a system may include a water cover, refrigerated chiller or carbon adsorber.
- iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
- v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.
- c. Material Requirements:
- i. On and after March 15, 1999, no person shall:
 - A. Cause or allow the sale of solvent with a vapor

pressure which exceeds 2.0 mmHg (0.038 psi) measured at 20EC (68EF) in units greater than five gallons, for use in cold cleaning degreasing operations located in the area covered by Section 218.103 of this part.

- B. Operate a cold cleaning degreaser with a solvent vapor pressure which exceeds 2.0 mmHg (0.038 psi) measured at 20EC (68EF).

ii. On and after March 15, 2001, no person shall:

- A. Cause or allow the sale of solvent with a vapor pressure which exceeds 1.0 mmHg (0.019 psi) measured at 20EC (68EF) in units greater than five gallons, for use in cold cleaning degreasing operations located in the area covered by Section 218.103 of this part.
- B. Operate a cold cleaning degreaser with a solvent vapor pressure which exceeds 1.0 mmHg (0.019 psi) measured at 20EC (68EF).

d. Recordkeeping Requirements: On and after March 15, 1999:

i. All persons subject to the requirements of subsections (c)(1)(A) and (c)(2)(A) of this Section must maintain records which include for each sale:

- A. The name and address of the solvent purchaser;
- B. The date of sale;
- C. The type of solvent;
- D. The unit volume of solvent;
- E. The total volume of solvent; and
- F. The vapor pressure of the solvent measured in mmHg at 20EC (68EF).

ii. All persons subject to the requirements of subsections (c)(1)(B) and (c)(2)(B) of this Section must maintain records which include for each purchase:

- A. The name and address of the solvent supplier;
- B. The date of purchase;
- C. The type of solvent; and

- D. The vapor pressure of the solvent measured in mmHg at 20EC (68EF).

- e. All records required by subsection (d) of this Section shall be retained for three years and shall be made available to the Illinois EPA upon request.

- f. The cleaning of electronic components as defined in 35 Ill. Adm. Code Section 211.1885 is exempt from the requirements of subsection (c) of this Section.

- g. Any cold cleaning taking place in a Detrex cold batch degreaser Model #2D-CC-SPL Size 24-4.10, or substantial equivalent, including automated loading of parts, totally enclosed operation (excluding loading and unloading) and permitted by the Illinois EPA, is exempt from the requirements of subsection (c) of this Section.

7. The Permittee shall maintain monthly records of the following items:
 - a. Names and amounts of inks, fountain solutions and clean-up solvents used (gallon/month);
 - b. VOM and HAP content of materials in item (a) (lb/gallon or wt. %);
 - c. The number of days during that calendar month that lithographic printing lines were in operation;
 - d. VOM emissions calculations for lithographic printing presses to demonstrate an exemption level of the daily VOM emissions performed pursuant to the procedures of Section 218.411(a)(1)(B) (no VOM retention of cleaning solvents is allowed); and
 - e. Total VOM and HAP emission calculations (tons/month and tons/year).
8. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
11. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

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

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

12. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: Annual ink solvent and thinner usage, VOM and HAP content of all materials, total VOM and HAP emissions for the year, and maximum daily VOM emissions calculations for lithographic printing.

It should be noted that the metal buffing machine is exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(aa).

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

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

DES:RBS:jar

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

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the printing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is handling 36,000 lbs of VOM total for all materials. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 10 tons per year of a single HAP, and 25 tons per year of combined HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

- 1a. Emissions of volatile organic material (VOM) from the entire facility:

<u>Operation</u>	<u>VOM Usage and Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Printing	1.6	16
Cold Cleaning	0.2	2

- b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

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