

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Universal Press, Inc.
Attn: Mark Allen
6125 West Howard
Niles, Illinois 60714

Application No.: 96080113
Applicant's Designation: PRESSROOM
Subject: Offset Lithographic Printing
Date Issued:
Location: 6125 West Howard, Niles

I.D. No.: 031201ADS
Date Received: August 19, 2002
Expiration Date:

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of ten sheetfed offset lithographic printing presses as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for VOM), as further described in Attachment A. As a result, the source is excluded from both the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit and from any requirements under 35 Ill. Adm. Code 203, Subpart B.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) issued for this location.
2. Emissions and operation of all sheetfed offset lithographic printing presses shall not exceed the following limits:

<u>Raw Material</u>	<u>VOM Content (Lb/Gal or Wt. %)</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
		<u>(Month)</u>	<u>(Year)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Ink	30 Wt. %	11,200 Lb	100,000 Lb	0.09	0.75
Fountain Solution	2.0 lb/gal	280 Gal	2,500 Gal	0.3	2.5
Clean-Up and Other Solvents	8.0 lb/gal	560 Gal	5,000 Gal	<u>2.3</u>	<u>20.0</u>
			Totals:	2.69	23.25

These limits define the potential emissions of VOM and are based on the maximum material usage, maximum VOM content, and 95% retention for the coldset ink. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 3a. This permit is issued based on the combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) being less than 100 lbs/day as determined in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B). Therefore, the requirements of 35 Ill. Adm. Code 218.407 and 218.410 are not applicable to the lithographic printing lines at this source.

- b. Pursuant to 35 Ill. Adm. Code 218.411(a) (1) (B) the Permittee shall perform calculations which demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source never exceed 100 lbs/day before the use of capture systems and control devices, as follows:
 - i. To calculate daily emissions of VOM, the Permittee shall determine the monthly emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) and divide this amount by the number of days during that calendar month that printing lines at the source were in operation;
 - ii. To determine the VOM content of the inks, fountain solution additives and cleaning solvents, the test methods and procedures set forth in 35 Ill. Adm. Code 218.409(c) shall be used;
 - iii. To determine VOM emissions from inks used on lithographic printing lines at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing lines; and
 - iv. To determine VOM emissions from fountain solutions and cleaning solvents used on lithographic printing lines at the source, no retention factor is used.
- 4a. Pursuant to 35 Ill. Adm. Code 218.411(a) (2) the Permittee shall collect and record either the information specified in (b) or (c) below for all lithographic printing lines at the source:
 - b. Standard recordkeeping, including the following:
 - i. The name and identification of each fountain solution additives, lithographic ink, and cleanup solvent used on any lithographic printing lines, recorded each month;
 - ii. A daily record which shows whether a lithographic printing line at the source was in operation on that day;
 - iii. The VOM content and the volume of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;
 - iv. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month; and
 - v. The VOM emissions in lbs/day for the month, calculated in accordance with 35 Ill. Adm. Code 218.411(a) (1) (B) and Special Condition 3(b).

- c. Purchase and inventory recordkeeping, including the following:
 - i. The name, identification, and VOM content of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;
 - ii. Inventory records from the beginning and end of each month indicating the total volume of each fountain solution additive, lithographic ink, and cleaning solvent to be used on any lithographic printing line at the source;
 - iii. Monthly purchase records for each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line at the source;
 - iv. A daily record which shows whether a lithographic printing line at the source was in operation on that day;
 - v. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month based on the monthly inventory and purchase records required to be maintained pursuant to 35 Ill. Adm. Code 218.411(a)(2)(B)(i), (a)(2)(B)(ii), and (a)(2)(B)(iii) and Special Conditions 4(c)(i), (c)(ii), and (c)(iii); and
 - vi. The VOM emissions in lbs/day for the month, calculated in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B).
- d. The Permittee shall maintain all records required by 35 Ill. Adm. Code 218.411 at the source for a minimum period of three years and shall make all records available to the Illinois EPA upon request.
- 5. Pursuant to 35 Ill. Adm. Code 218.411(a)(3), the Permittee shall notify the Illinois EPA in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source ever exceed 100 lbs/day, before the use of capture systems and control devices, within 30 days after the event occurs. Such notification shall include a copy of all records of such event.
- 6a. Within 90 days of a written request from the Illinois EPA the Permittee shall submit data on the volatile organic material content of the representative inks as applied determined by laboratory analysis in accordance with the 35 Ill. Adm. Code Section 218.105.
 - b. The submitted data shall include: the VOM content of the inks, a justification of why these are representative, and a description of the sampling procedures, and documentation for the analysis.
 - c. The Illinois EPA may provide additional time for the performance of this testing upon request from the Permittee which shows that it is not feasible to perform representative testing within 90 days.

7. The emission of HAPs is 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 by rule which would require the Permittee to obtain a Clean Air Act Permit Program 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 requirements to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
8. 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 and 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 request for records during the course of a source inspection.
9. 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.
10. The Permittee shall submit the following additional information from the prior calendar year, along with the Annual Emissions Report, due May 1st of each year:
 - a. Total solvent usage (gal/month and gal/year);
 - b. Fountain solution usage (gal/month and gal/year);
 - c. Ink usage (lb/month and lb/yr);
 - d. VOM content for each group of materials listed above (lb/gal or Wt.%); and
 - e. Detailed calculations of VOM emissions.
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
Bureau of Air
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

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

Illinois Environmental Protection Agency
Division of Air Pollution Control - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

Page 5

It should be noted that this permit has been revised to increase the usage and VOM emissions limits.

It should be noted that this permit has been revised to no longer include two presses.

If you have any questions on this, please call Tara T. Nguyen-Ede at 217/782-2113.

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

DES:TNE:jar

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

Attachment A

This attachment provides a summary of the maximum emission from the sheetfed lithographic printing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The total ink, fountain solution, alcohol and clean-up solvent usage are limited the potential to emit of VOM to below major source thresholds. The resulting maximum emissions are well below levels ,e.g., 25 tons per year of VOM, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program and 35 Ill. Adm. Code Part 203. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

1. Emissions and operation of all sheetfed offset lithographic printing presses shall not exceed the following limits:

<u>Raw Material</u>	<u>VOM Content (Lb/Gal or Wt. %)</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
		<u>(Month)</u>	<u>(Year)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Ink	30 Wt. %	11,200 Lb	100,000 Lb	0.09	0.75
Fountain Solution	2.0 lb/gal	280 Gal	2,500 Gal	0.3	2.5
Clean-Up and Other Solvents	8.0 lb/gal	560 Gal	5,000 Gal	2.3	20.0
Totals:				2.69	23.25

These limits define the potential emissions of VOM and are based on the maximum material usage, maximum VOM content, and 95% retention for the coldset ink. Compliance with annual limits shall be determined from a running total of 12 months of data.

2. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

TNE:jar