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1.0 SOURCE IDENTIFICATION

1.1 Source

Rollprint Packaging Products, Inc.
320 Stewart Avenue
Addison, Illinois 60101-3375
630/628-1700

I.D. No.: 043005AJS
Standard Industrial Classification: 2671, Paper and Allied
Products Source

1.2 Owner/Parent Company

Rollprint Packaging Products, Inc.
320 Stewart Avenue
Addison, Illinois 60101-3375

1.3 Operator

Rollprint Packaging Products, Inc.
320 Stewart Avenue
Addison, Illinois 60101-3375

Dhuanne Dodrill, Director Quality Assurance and Research
630/628-1700

1.4 General Source Description

Rollprint Packaging Products, Inc. is located 320 Stewart Avenue. The source is a converter of flexible and semi-rigid packaging materials and composite products used primarily in high-end medical, food, and industrial applications. As a custom converter, the source creates packaging materials and composite products designed to meet a customers particular needs.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	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
ATUs	Allotment Trading Units
BAT	Best Available Technology
Btu	British Thermal Unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
°F	degrees Fahrenheit
ft ³	Cubic Feet
gal	Gallons
HAP	Hazardous Air Pollutant
hr	Hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	Kilogram
kW	Kilowatts
l	Liter
LAER	Lowest Achievable Emission Rate
lb	Pound
MACT	Maximum Achievable Control Technology
Mg	Megagram
mmBtu	Million British Thermal Units
mmft ³	Million Cubic Feet
mmtherms	Million Therms
mo	Month
MW	Megawatt
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration
psia	Pounds per Square Inch Absolute
PTE	Permanent Total Enclosure
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T	Tons
T1	Title I - identifies Title I conditions that have been carried over from an existing construction 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 construction permit and subsequently revised in this permit
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
wt%	Weight Percent
yr	Year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability,

such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Coater/Laminators: Ultra-Lam Coater/Laminator GFG Coater/Laminator Duoflex Coater/Laminator	2/91 12/68 12/70	PTE and Afterburner PTE and Afterburner PTE and Afterburner
02	Millenium Extruder Laminator	12/97	None
03	Rotogravure Printing Press: Roto Printing Press Flexographic Printing Presses: 660 Kidder Printing Press 434 Kidder Printing Press Heinrich Printing Press Ashton Printing Press	1/82 2/82 3/82 4/82 5/82	None
04	Fuel Combustion Emission Units: Ultra-Lam Oven Ultra-Lam Afterburner GFG Oven GFG Afterburner Duoflex Oven Duoflex Afterburner Millenium Oven 660 Kidder Oven 434 Kidder Oven Heinrich Oven Roto Oven	2/91 10/91 12/68 10/90 12/70 10/90 12/97 2/82 3/82 4/82 1/82	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. 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 overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b.
 - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
 - ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
 - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied

on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

- c. 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 the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

5.2.3 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:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. 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 (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 Should this stationary source, as defined in 40 CFR Part 63, become subject to 40 CFR Part 63, then the owner or operator shall comply with the applicable requirements of 40 CFR Part 63 by the date(s) specified in the NESHAP and shall certify compliance with the applicable requirements of 40 CFR Part 63 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, 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. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	132.42
Sulfur Dioxide (SO ₂)	0.07
Particulate Matter (PM)	1.4
Nitrogen Oxides (NO _x)	11.78
HAP, not included in VOM or PM	--
TOTAL	145.67

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Records for Operating Scenarios

None

5.6.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

None

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating HAP Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by condition 6.8, 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 6.5.
 - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), 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 7.0 of this permit.

6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. 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 Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA 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.
- c. 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 Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 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 [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, 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:
 - i. An initial emergency condition report within two days after the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. 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 Illinois EPA;

- v. 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); and
 - vi. 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.
- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 328 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 37.22 tons.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA 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.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

Not Applicable

c. 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:

- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
- ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
 - 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; and
- iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

NG Fired Combustion Unit

- b. VOM emissions from the emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirements specified in IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA 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 [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 - Coater/Laminators
Control 01 - PTE and Afterburners

7.1.1 Description

Three coater/laminators are used to laminate and coat films, foils, paper, and other composite materials using water-based or solvent-based coatings. Overlacquers and primers may also be applied on this equipment. The only difference between laminating and coating is that a secondary web is introduced during the laminating process. Each coater/laminator has a dryer to dry the coatings which is vented through a permanent total enclosure into a catalytic afterburner to control VOM emissions. VOM emissions result from the use of solvent based materials. Fuel combustion emissions results from the use of natural gas in the dryers and afterburners and are covered by Section 7.5.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	Coater/Laminators	
	Ultra-Lam Coater/Laminator	PTE and Afterburner
	GFG Coater/Laminator	PTE and Afterburner
	Duoflex Coater/Laminator	PTE and Afterburner

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line" for the purpose of these unit-specific conditions, is each coater/laminator with respective dryer, permanent total enclosure, and catalytic afterburner.
- b.
 - i. The affected coating lines are subject to the emission limits identified in Condition 5.2.2.
 - ii. The affected coating lines are subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises,

exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- iii. The affected coating lines are subject to 35 IAC 212.322(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 2) [35 IAC 212.322(a)].

- iv. When processing non-compliant coatings, the affected coating lines shall be equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency [35 IAC 218.207(b)(1)].

- v. When processing compliant coatings, the owner or operator of an affected coating line shall not apply at any time any coating in which the VOM content exceeds the following limitations [35 IAC 218.204(c)]:

<u>kg/liter</u>	<u>lb/gallon</u>
0.28	2.3

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected coating line is not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, which excludes the affected coating lines from these requirements.
- b. If an affected coating line is equipped with (or uses) a PTE that meets Illinois EPA and USEPA specifications, and which directs all VOM to a control device, then the affected coating line is exempted from the capture efficiency testing requirements described in 35 IAC 218.105(c)(2). The Illinois EPA and USEPA specifications to determine whether a structure is considered a PTE are given in

35 IAC Part 218 Procedure T of Appendix B. In this instance, the capture efficiency is assumed to be 100 percent and the emission unit is still required to measure control efficiency using appropriate test methods as specified in 35 IAC 218.105(d) [35 IAC 218.105(c)(1)(A)].

7.1.5 Operational Limitations and Control Requirements

- a. Each affected coating line shall only be operated with natural gas as the fuel in the coating dryers and catalytic afterburner.
- b. The capture system and control device shall be operated at all times each affected coating line is in operation [35 IAC 218.207(a)] except when complying with 35 IAC 218.204.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected coating lines are subject to the following:

- a. Operations and emissions of the Ultra-Lam Coater Laminator with catalytic afterburner shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>(T/mo)</u>	<u>(T/yr)</u>	<u>(T/mo)</u>	<u>(T/yr)</u>
17.11	205	3.25	39.0

- b. VOM emissions from cleaning solvent shall not exceed the following limits:

VOM Emissions	
<u>(T/mo)</u>	<u>(T/yr)</u>
0.013	0.16

The above limitations were established in Permit 91010089, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

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 months total). [T1]

7.1.7 Testing Requirements

- a. The VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 [35 IAC 218.204 and 218.207(a)].
- b. Sources utilizing a PTE must demonstrate that this enclosure meets the requirement given in 35 IAC Part 218 Procedure T of Appendix B for a PTE during any testing of their control device [35 IAC 218.105(c)(3)(D)].
- c. The control device efficiency shall be determined by simultaneously measuring the inlet and outlet gas phase VOM concentrations and gas volumetric flow rates in accordance with the gas phase test methods specified in 35 IAC 218.105(f) [35 IAC 218.105(d)(1)].
- d. The following VOM gas phase source test methods shall be used to determine control device efficiencies [35 IAC 218.105(f)].
 - i. 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, as appropriate to the conditions at the site, shall be used to determine VOM concentration. Method selection shall be based on consideration of the diversity of organic species present and their total concentration and on consideration of the potential presence of interfering gases. The test shall consist of three separate runs, each lasting a minimum of 60 minutes, unless the Illinois EPA and the USEPA determine that process variables dictate shorter sampling times.
 - ii. 40 CFR Part 60, Appendix A, Method 1 or 1A, shall be used for sample and velocity traverses.
 - iii. 40 CFR Part 60, Appendix A, Method 2, 2A, 2C or 2D, shall be used for velocity and volumetric flow rates.

- iv. 40 CFR Part 60, Appendix A, Method 3, shall be used for gas analysis.
 - v. 40 CFR Part 60, Appendix A, Method 4, shall be used for stack gas moisture.
 - vi. 40 CFR Part 60, Appendix A, Methods 2, 2A, 2C, 2D, 3 and 4, shall be performed, as applicable, at least twice during each test run.
- e. The percent concentration of solvent in the VOM containing waste from the affected coating line shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

7.1.8 Monitoring Requirements

The catalytic afterburner shall use a Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained and operated according to vendor specifications at all times the catalytic afterburner is in use. The continuous monitoring equipment shall monitor and record the temperature rise across each catalytic afterburner bed [35 IAC 218.105(d)(2)].

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected coating line to demonstrate compliance with Conditions 5.5.1 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The owner or operator of an affected coating line shall collect and record all of the following information each day for each affected coating line and maintain the information at the source for a period of three years [35 IAC 218.211(e)(2)].
 - i. Control device monitoring data.
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated coating line.
 - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine

maintenance performed including dates and duration of any outages.

- b. The owner or operator shall maintain a log of operating time of when compliant coatings are used and when the catalytic afterburner is shutdown.
- c. The name and identification number of each coating and cleanup solvent used.
- d. The VOM content (lb VOM/gal) of each coating complying with 35 IAC 218.204.
- e. The VOM content (wt%) of each coating and cleanup solvent used.
- f. Usage of each coating and cleanup solvent (T/mo).
- g. VOM containing waste collected (T/mo).
- h. The VOM content of the VOM containing waste collected, as determined in accordance with Condition 7.1.7 (wt%).
- i. VOM emissions calculated in accordance with the procedures given in Condition 7.1.12 (T/mo and T/yr).
- j. The capture efficiency protocol submitted to the Illinois EPA and the USEPA. A copy of the results must be kept on file with the source for a period of three years [35 IAC 218.105(c)(3)(A)].

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected coating line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Emissions of VOM from the affected coating lines in excess of the limits specified in Condition 5.5.1 and 7.1.6.
- b. Any record showing violation of 35 IAC 218.207 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.211(e)(3)(A)].

- c. At least 30 calendar days before changing the method of compliance 35 IAC 218.207 to 35 IAC 218.204 or 218.205, the owner or operator shall comply with all requirements of 35 IAC 218.211(c)(1) or (d)(1), respectively. Upon changing the method of compliance with this subpart from 35 IAC 218.207 to 35 IAC 218.204 or 218.205, the owner or operator shall comply with all requirements of 35 IAC 218.211(c) or (d), respectively [35 IAC 218.211(e)(3)(B)].
- d. All results of the appropriate test methods and capture efficiency protocols must be reported to the Illinois EPA within sixty days of the test date [35 IAC 218.105(c)(3)(A)].
- e. If any changes are made to capture or control equipment, then the source is required to notify the Illinois EPA and the USEPA of these changes and a new test may be required by the Illinois EPA or the USEPA [35 IAC 218.105(c)(3)(B)].
- f. The source must notify the Illinois EPA thirty days prior to performing any capture efficiency or control test. At that time, the source must notify the Illinois EPA which capture efficiency protocol and control device test methods will be used [35 IAC 218.105(c)(3)(C)].

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the coatings or cleaning solutions used, provided the affected coating lines continue to comply with the Conditions in Section 7.1 of this permit.
- b. Each affected coating line is allowed to shutdown its' respective catalytic afterburner when using compliant coatings provided the affected coating complies with Condition 7.1.3(b)(v).

7.1.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the work-practices inherent in operation of an affected coating line.
- b. To determine compliance with Condition 5.5.1 and 7.1.6, VOM emissions from the affected coating lines shall be calculated based on the following:

$$E_T = E_1 + E_2 - E_3$$

Where:

E_T = Total VOM Emissions (T/mo)

$$U_v = U_1 \times V_1$$

Where:

U_v = Coating VOM Usage (tons/month)

U_1 = Coating Usage (tons/month)

V_1 = Coating VOM Content (wt%)

$$E_1 = U_v(\eta/100)[1-(\epsilon/100)]$$

Where:

E_1 = Coating VOM Emissions (tons/month)

U_v = Coating VOM Usage (T/mo)

η = Capture Efficiency(100%)*

ϵ = Control Efficiency(95%)*

* Based upon most recent stack test.

$$E_2 = U_2 \times V_2$$

Where:

E_2 = Cleanup Solvent VOM Emissions (T/mo)

U_2 = Cleanup Solvent Usage (T/mo)

V_2 = Cleanup Solvent VOM Content (wt%)

$$E_3 = C_3 \times V_3$$

Where:

E_3 = VOM Containing Waste Credit (T/mo)

C_3 = VOM Containing Waste Collected (T/mo)

V_3 = VOM Containing Waste VOM Content (wt%)*

* As measured in accordance with Condition 7.1.7(b).

7.2 Unit 02 - Millenium Extruder Laminator
 Control 02 - None

7.2.1 Description

The Millenium extruder laminator is used to laminate and coat flexible coating and composite materials. The Millenium extruder has a gas fired dryer. VOM emissions result from the use of solvent based materials. Fuel combustion emissions results from the use of natural gas in the dryer and are covered by Section 7.5.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
02	Millenium Extruder Laminator	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line" for the purpose of these unit-specific conditions, is the Millenium coater/laminator with respective dryer.
- b. i. The affected coating line is subject to the emission limits identified in Condition 5.2.2.
- ii. The affected coating lines are subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- iii. No owner or operator of an affected coating line shall apply coatings on the affected coating line, during any day, whose whole daily-weighted average VOM content exceeds the emission limitations for paper coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) "as

applied" at each coating applicator [35 IAC 218.204(c) and 218.205(a)]:

<u>kg/liter</u>	<u>lb/gallon</u>
0.28	2.3

7.2.4 Non-Applicability of Regulations of Concern

The affected coating line is not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, which excludes the affected coating lines from these requirements.

7.2.5 Operational Limitations and Control Requirements

The affected coating line shall only be operated with natural gas as the fuel in the dryer.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected coating line is subject to the following:

Emissions and operation of the laminator shall not exceed the following limits:

<u>Item of Equipment</u>	<u>VOM Usage</u> <u>T/yr</u>	<u>VOM Emissions</u> <u>T/yr</u>
Millenium Extrusion Laminator	25.3	24.9

The above limitations were established in Permit 97090007, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. [T1].

7.2.7 Testing Requirements

- a. The VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105. The applicable analytical methods specified below shall be used to determine the composition of coatings as applied:

Method 24 of 40 CFR 60, Appendix A, shall be used to determine the VOM content and density of coatings. If it is demonstrated to the

satisfaction of the Illinois EPA and the USEPA that plant coating formulation data are equivalent to Method 24 results, formulation data may be used. In the event of any inconsistency between a Method 24 test and a source's formulation data, the Method 24 test will govern [35 IAC 218.105(a)].

- b. The percent concentration of solvent in the VOM containing waste from the affected coating line shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected coating line to demonstrate compliance with Conditions 5.5.1 and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall collect and record all of the following information each day for the affected coating line and maintain the information at the source for a period of three years [35 IAC 218.211(d)(2)]:
 - i. The name and identification number of each coating as applied on the affected coating line.
 - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the affected coating line.
 - iii. The daily-weighted average VOM content of all coatings as applied on the affected coating line.
- b. The Permittee shall collect and record all of the following information each day, as summarized on a weekly basis, for the affected coating line and maintain the information at the source for a period of three years:

- i. Coating and cleanup solvent usage (lb/day).
 - ii. VOM content (wt%) of each coating and cleanup solvent used.
- c. Solvent reclaimed or disposed of (T/mo).
 - d. VOM content (wt%) of VOM containing waste disposed of or recycled as determined by the testing procedures in Condition 7.2.7.
 - e. VOM emissions calculated in accordance with the procedures given in Condition 7.2.12 (lb/day and T/yr).

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected coating line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Upon initial start-up of the laminator, the Permittee shall certify to the Illinois EPA that the laminator will be in compliance with 35 IAC 218.205. Such certification shall include [35 IAC 218.211(d)(1)]:
 - i. The name and identification number of each coating line which will comply by means of 35 IAC 218.205.
 - ii. The name and identification number of each coating as applied on the laminator.
 - iii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the laminator.
 - iv. The instrument or method by which the Permittee will accurately measure or calculate the volume of each coating as applied each day on the laminator.
 - v. The method by which the Permittee will create and maintain records each day as required in Condition 5(a)(iii).

- vi. An example of the format in which the records required in Condition 5(a)(iii) will be kept.
- b. The Permittee shall notify the Illinois EPA in the following instances:
 - i. Emissions of VOM from the affected coating lines in excess of the limits specified in Condition 5.5.1 and 7.2.6.
 - ii. Any record showing violation of 35 IAC 218.205 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.211(d)(3)(A)].
 - iii. At least 30 calendar days before changing the method of compliance from 35 IAC 218.205 to 218.204 or 218.207, the Permittee shall comply with all requirements of 35 IAC 218.211(c)(1) or (e)(1), respectively. Upon changing the method of compliance from 35 IAC 218.205 to 218.204 or 218.207, the Permittee shall comply with all requirements of 35 IAC 218.211 (c) or (e), respectively [35 IAC 218.211(d)(3)(B)].

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in the coatings or cleaning solutions used, provided the affected coating line continue to comply with the Conditions in Section 7.2 of this permit.

7.2.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the work-practices inherent in operation of an affected coating line.
- b. The following formula shall be used to calculate the daily-weighted average VOM content of all coatings as

applied on the affected coating line [35 IAC 211.1670]:

$$\text{VOM}_w = \left[\sum_{i=1}^n V_i C_i \right] / V_T$$

where:

- VOM_w = The average VOM content of two or more coatings as applied each day on the laminator in units of kg VOM/l (lbs VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM),
- n = The number of different coatings as applied each day on the laminator,
- V_i = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the laminator in units of l (gal).
- C_i = The VOM content of each coating as applied each day on the laminator in units of kg VOM/l (lbs VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM), and
- V_T = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the laminator in units of l (gal).

- c. To determine compliance with Condition 5.5.1 and 7.2.6, VOM emissions from the affected coating line shall be calculated based on the following:

$$E_T = E_1 + E_2 - E_3$$

Where:

E_T = Total VOM Emissions (T/day)

$$E_1 = U_1 \times V_1$$

Where:

E_1 = Coating VOM Emissions (T/day)
 U_1 = Coating Usage (T/day)
 V_1 = Coating VOM Content (wt%)

$$E_2 = U_2 \times V_2$$

Where:

E_2 = Cleanup Solvent VOM Emissions (T/day)
 U_2 = Cleanup Solvent Usage (T/day)
 V_2 = Cleanup Solvent VOM Content (wt%)

$$E_3 = C_3 \times V_3 \div CD$$

Where:

E_3 = VOM Containing Waste Credit (T/day)
 C_3 = VOM Containing Waste Collected (T/mo)
 V_3 = VOM Containing Waste VOM Content (wt%)*
CD = Calendar Days per Month (days/month)

* As measured in accordance with Condition 7.2.7(b).

7.3 Unit 03 - Flexographic and Rotogravure Printing Presses
 Control 03 - None

7.3.1 Description

Four flexographic printing presses and one rotogravure printing press are used to print on films, foils, paper, and composite materials, using water-based and solvent-based inks. This equipment is also used to apply overlacquers, primers, and coatings. The printing is a continuous process performed on rollstock. Each printing press has a gas fired dryer to dry the inks, with the exception of the Ashton printing press which has a electric dryer. VOM emissions result from the use of solvent based materials. Fuel combustion emissions results from the use of natural gas in the dryer and are covered by Section 7.4.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
03	Rotogravure Printing Press Roto Printing Press Flexographic Printing Presses 660 Kidder Printing Press 434 Kidder Printing Press Heinrich Printing Press Ashton Printing Press	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected printing line" for the purpose of these unit-specific conditions, is each printing press with associated dryer.
- b. Applicable Emission Limits
 - i. Each affected printing line is subject to the emission limits identified in Condition 5.2.2.
 - ii. Each affected printing line is subject to 35 IAC 212.321(a), which provides that:
 - A. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar

process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- iii. The owner or operator shall not cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from the each affected ink mixing tank. If no odor nuisance exists this limitation shall apply only to photochemically reactive material [35 IAC 218.301].
- iv. The affected printing lines are subject to 40 CFR 63 Subpart KK - NESHAP for the Printing and Publishing Industry, because the source is a major source of HAP, as defined in 40 CFR Part 63.2, at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated. Each product and packaging rotogravure or wide-web flexographic printing affected source at a source that is a major source of HAP, as defined in 40 CFR Part 63.2, that complies with the following criteria on and after May 30, 1999 is subject only to the requirements of 40 CFR 63.829(e) and 63.830(b)(1) [40 CFR 63.821(b)]:

The owner or operator of the source shall apply no more than 400 kg/mo, for every month, of organic HAP on product and packaging rotogravure or wide-web flexographic printing presses [40 CFR 63.821(b)(2)].

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected printing lines are not subject to 35 IAC 218.204(c), Coating Operations - Paper Coating, as the paper coating limitation does not apply to a line on which printing is performed which complies with the emission limitations in 35 IAC 218.401 [35 IAC 218.204(c)].
- b. The affected printing lines are not subject to 35 IAC 218.401, Flexographic and Rotogravure Printing, since the flexographic and rotogravure printing lines

(including solvents used for cleanup operations associated with flexographic and rotogravure printing line(s)) at the source have a potential to emit less than 22.7 Mg (25 tons) VOM per year [35 IAC 218.402(a)(2)].

- c. This permit is issued based on the affected printing presses not being subject to 40 CFR 60, Subpart QQ - Standards for Performance for the Graphic Arts Industry: Publication Rotogravure Printing, because the affected printing presses are not publication rotogravure printing presses.
- d. This permit is issued based on the affected printing presses not being subject to 40 CFR 60, Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing, because the affected printing presses are not used to coat flexible vinyl or urethane products which excludes flexible packaging.

7.3.5 Operational Limitations

Each affected printing line shall only be operated with natural gas as the fuel in the press dryers.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected printing lines are subject to the following:

Emissions and operation shall not exceed the following limits:

VOM Usage <u>(T/yr)</u>	VOM Emissions <u>(T/yr)</u>
24.9	24.9

These limits effectively limits the potential to emit below the applicability level for 35 IAC 218.401, Flexographic and Rotogravure Printing, of 25 tons/yr pursuant to 35 IAC Part 218.402(a)(2).

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) [T1N].

7.3.7 Testing Requirements

- a. The VOM content of each coating, ink, and cleanup solvent shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 as specified below:
 - i. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used; provided, however, Method 24, shall be used to demonstrate compliance; or
 - ii. The manufacturer's specifications for VOM contents may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a); provided, however, Method 24 shall be used to determine compliance.
- b. The percent concentration of solvent in the VOM containing waste from the affected printing line shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected printing lines to demonstrate compliance with Conditions 5.5.1 and 7.3.6 pursuant to Section 39.5(7)(b) of the Act:

- a. The name and identification number of each coating and ink "as applied" on each printing line [35 IAC 218.404(b)(2)(A)].
- b. The VOM content (wt%) and volume (lb/day) of each coating and ink as applied each year on each printing [35 IAC 218.404(b)(2)(B)].
- c. The name and identification number of each cleanup solvent used.
- d. The VOM content (wt%) and volume (lb/day) of each cleanup solvent used.

- e. VOM containing waste collected (lb/day).
- f. The VOM content of the VOM containing waste collected, as determined in accordance with Condition 7.3.7 (wt%).
- g. VOM emissions calculated in accordance with the procedures given in Condition 7.3.12 (T/day and T/yr).
- h. The owner or operator of a source which meets the limits and criteria of 40 CFR 63.821(b)(2) shall maintain records as required below. Owners or operators shall maintain these records for five years, and upon request, submit them to the Illinois EPA or the USEPA [40 CFR 63.829(e)].

The owner or operator shall maintain records of the total volume and organic HAP content of each material applied on product and packaging rotogravure or wide-web flexographic printing presses during each month.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected printing lines with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Emissions of VOM from the affected printing lines in excess of the limits specified in Condition 5.5.1 and 7.3.6 based on the current day's records plus the preceding 364 days within 30 days of such an occurrence.
- b. The owner or operator of a flexographic and rotogravure printing line exempted from the limitations of 35 IAC 218.401 because of the criteria in 35 IAC 218.402 shall notify the Illinois EPA of any record showing that total maximum theoretical emissions of VOM from all printing lines exceed 90.7 Mg (100 tons) and/or the potential to emit exceeds 22.7 Mg (25 tons) in any calendar year before the application of capture systems and control devices by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs [35 IAC 218.404(b)(3)].

- c. Each owner or operator of an affected source subject to 40 CFR 60 Subpart KK shall submit the reports specified below to the Illinois EPA and the USEPA [40 CFR 63.9(b), 63.821(b), and 63.830(b)(1)]:
 - i. Initial notifications for existing sources shall be submitted no later than May 30, 1998.
 - ii. For the purpose of 40 CFR 60 Subpart KK, a 40 CFR Part 70 permit application may be used in lieu of the initial notification required under 40 CFR 63.9(b), provided the same information is contained in the permit application as required by 40 CFR 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under 40 CFR Part 70 and has received delegation of authority from the EPA.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected printing lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in the inks or cleaning solutions used, provided the affected printing lines continue to comply with the Conditions in Section 7.3 of this permit.

7.3.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the work-practices inherent in operation of an affected printing line.
- b. To determine compliance with Condition 5.5.1 and 7.3.6, VOM emissions from the affected printing lines shall be calculated based on the following:

$$E_T = E_1 + E_2 - E_3$$

Where:

E_T = Total VOM Emissions (T/day)

$$E_1 = U_1 \times V_1$$

Where:

E_1 = Ink VOM Emissions (T/day)

U_1 = Ink Usage (T/day)

V_1 = Ink VOM Content (wt%)

$$E_2 = U_2 \times V_2$$

Where:

E_2 = Cleanup Solvent VOM Emissions (T/day)

U_2 = Cleanup Solvent Usage (T/day)

V_2 = Cleanup Solvent VOM Content (wt%)

$$E_3 = C_3 \times V_3 \div CD$$

Where:

E_3 = VOM Containing Waste Credit (T/day)

C_3 = VOM Containing Waste Collected (T/mo)

V_3 = VOM Containing Waste VOM Content (wt%)*

CD = Calendar Days per Month (days/mo)

* As measured in accordance with Condition 7.3.7(b).

7.4 Unit 04 - Fuel Combustion Emission Units
 Control 04 - None

7.4.1 Description

The source has several fuel combustion emission units including gas fired ovens and afterburners. In addition the source has several insignificant gas fired emission units. Fuel combustion emissions result from the use of natural gas in the above emission units. The Permittee has opted to establish a source wide natural gas usage which includes usage from the insignificant emission units thus eliminating the need to monitor natural gas usage at each emission unit, providing greater flexibility in the monitoring and recordkeeping provisions for natural gas.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Firing Rate mmBtu/hr	Emission Control Equipment
04	Fuel Combustion Emission Units:		None
	Ultra-Lam Oven	3.20	
	Ultra-Lam Afterburner	4.00	
	GFG Oven	1.60	
	GFG Afterburner	3.60	
	Duoflex Oven	0.76	
	Duoflex Afterburner	3.60	
	Millenium Oven	2.40	
	660 Kidder Oven	2.45	
	434 Kidder Oven	0.90	
Heinrich Oven	0.50		
Roto Oven	3.88		

7.4.3 Applicability Provisions and Applicable Regulations

a. The "affected fuel combustion emission units" for the purpose of these unit-specific conditions, is the fuel combustion emission units as listed above and the insignificant emission units.

b. Applicable Emission Limits

The affected fuel combustion emission units are subject to the emission limits identified in Condition 5.2.2.

7.4.4 Non-Applicability of Regulations of Concern

a. Each affected fuel combustion emission unit is not subject to NSPS, 40 CFR 60, Subpart Dc, Small

Industrial-Commercial-Institutional Steam Generating Units, since each steam generating unit was either constructed, modified, or reconstructed prior to June 9, 1989 and/or has a maximum design heat input capacity of less than to 2.9 MW (10 mmBtu/hr).

- b. Each affected fuel combustion emission unit is not subject to 35 IAC 216.121, Fuel Combustion Emission Sources, since the actual heat input from each affected fuel combustion emission unit is less than 2.9 MW (10 mmBtu/hr).
- c. Each affected fuel combustion emission unit is not subject to 35 IAC 217.141, Existing Emission Sources in Major Metropolitan Areas, since the actual heat input of each affected fuel combustion emission unit is less than 73.2 MW (250 mmBtu/hr).
- d. Each affected fuel combustion emission unit is not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.303, Fuel Combustion Emission Sources, which excludes each affected fuel combustion emission unit from this requirement.

7.4.5 Operational Limitations

Natural gas shall be the only fuel fired in the affected fuel combustion emission units.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected fuel combustion emission units are subject to the following:

- a. Operation of the affected fuel combustion emission units shall not exceed the following limits:

Natural Gas Usage	
mmtherms/mo	mmtherms/yr
0.20	2.36

- b. Emissions of the affected fuel combustion emission units shall not exceed the following limits:

Pollutant	Emissions	
	(T/mo)	(T/yr)
NO _x	0.98	11.78
PM	0.12	1.40
SO ₂	0.01	0.07
VOM	0.03	0.33

These limits are based upon the maximum natural gas usage determined from the maximum firing rate at the maximum operating hours (8760 hr/yr) and standard emission factors as detailed in Condition 7.4.12. 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). [T1]

- c. The above limitations contain revisions to previously issued Permit 97090007. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. [T1R].

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected fuel combustion emission units to demonstrate compliance with Conditions 5.5.1 and 7.4.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Fuel usage (mmtherms/mo); and
- b. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.4.12 (T/mo).

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected fuel combustion emission units with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions of NO_x, PM, SO₂, or VOM from the affected fuel combustion emission units in excess of the limits specified in Condition 5.5.1 and 7.4.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected fuel combustion emission units without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

7.4.12 Compliance Procedures

To determine compliance with Condition 5.5.1 and 7.4.6, emissions from the affected fuel combustion emission units shall be calculated based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

<u>Pollutant</u>	Natural Gas Emission Factor (lb/mmft ³)
NO _x	100
PM	11.9
SO ₂	0.6
VOM	5.5

These are the emission factors for NO_x, PM, SO₂, and VOM for uncontrolled natural gas combustion in commercial boilers (0.3 - < 100 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, July, 1998. VOM emission factor based on TOC factor corrected for 34% methane contribution.

$$E = U \times F \times (0.05)^*$$

Where:

E = Emissions per Pollutant (T/mo)

U = Natural Gas Usage (mmtherms/mo)

F = Pollutant Emission Factor (lbs/mmft³)

* Based upon the following conversion factors:

2000 lb/ton

1000 Btu/ft³

1 Therm/100,000 Btu

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee 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 Illinois EPA, 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 June 18, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 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].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA,

emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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. 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 Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. 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 source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be

submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

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

iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not 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 an owner or operator of a 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 CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee 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, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner

unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee 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.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 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 thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA 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]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. 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].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certifications shall include descriptions of means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; 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.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee 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].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two 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; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated 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.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, 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].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA 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 Permittee

shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee 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].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Section 212.321: Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972

- a. Except as further provided in this Part, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.
- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

where:

P = Process weight rate; and
E = Allowable emission rate; and,

- i. Up to process weight rates of 408 MG/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

- c. Limits for Process Emission Units For Which Construction of Modification Commenced On or After April 14, 1972

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.	3.9	10.00	8.70
13.	4.8	15.00	10.80
18.	5.7	20.00	12.50
23.	6.5	25.00	14.00
27.	7.1	30.00	15.60
32.	7.7	35.00	17.00
36.	8.2	40.00	18.20
41.	8.8	45.00	19.20
45.	9.3	50.00	20.50
90.	13.4	100.00	29.50
140.	17.0	150.00	37.00
180.	19.4	200.00	43.00
230.	22.	250.00	48.50
270.	24.	300.00	53.00
320.	26.	350.00	58.00
360.	28.	400.00	62.00
408.	30.1	450.00	66.00
454.	30.4	500.00	67.00

where:

P = Process weight rate in metric or T/hr, and
E = Allowable emission rate in kg/hr or lbs/hr.

10.2 Attachment 2 Section 212.322: Process Emission Units For Which Construction or Modification Commenced Prior to April 14,1972

- a. Except as further provided in this Part, no person shall cause or allow the emission of particulate matter 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 particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.
- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

where:

P = process weight rate; and,
 E = allowable emission rate; and,

- i. For process weight rates up to 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

- ii. For process weight rates in excess or 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

- c. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972

	Metric	English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.	8.7	10.00	19.20
13.	11.1	15.00	25.20
18.	13.8	20.00	30.50
23.	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

where:

P = Process weight rate in Mg/hr or T/hr, and
E = Allowable emission rate in kg/hr or lbs/hr.

10.3 Attachment 3 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature _____

Name _____

Official Title _____

Telephone No. _____

Date Signed _____

KL:psj