

217/782-2113

JOINT CONSTRUCTION AND LIFETIME OPERATING PERMIT

PERMITTEE

Creative Card Co.
Attn: David Juracic
6220 West 73rd Street
Bedford Park, Illinois 60638

Application No.: 99070085 I.D. No.: 031012AGE
Applicant's Designation: FESOP-W.73RD Date Received: July 28, 1999
Subject: Printing Operations
Date Issued: Expiration Date: See Condition 1.
Location: 6220 West 73rd Street, Bedford Park

This permit is hereby granted to the above-designated Permittee to CONSTRUCT and OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Non-Heatset Offset Printing Operations
Silk Screen Printing Operations

pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This permit shall expire 180 days after the Illinois EPA sends a written request for the renewal of this permit.
- b. This permit shall terminate if it is withdrawn or is superseded by a revised permit.
2. These conditions effectively limit the potential emissions of air pollutants from the source to less than major source thresholds (i.e., VOM to less than 25 tons per year). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit.
- 3a. Emissions and usage from all offset printing operations shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb/Gal)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Offset Inks (Pounds)*	1,060	10,600	0.37	0.01	0.10
Roller Wash	99	990	6.80	0.34	3.40
Type Wash	290	2,900	4.50	0.65	6.50
Fountain Solution	30	300	0.68	0.01	0.10
Miscellaneous Products	N/A	N/A	N/A	<u>0.04</u>	<u>0.35</u>
				<u>Subtotal, Offset Printing:</u>	<u>10.45</u>

* VOC emissions represent the ink emission adjustment factor of 0.05 described in 218.411(a)(1)(B)(ii) for non-heatset inks.

b. Emissions and usage from all screen printing operations shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u> <u>(Lb/Gal)</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>		<u>(T/Mo)</u>	<u>(T/Yr)</u>
Screening Inks	230	2,300	5.20	0.60	6.00
Adhesive	220	2,200	2.80	0.31	3.10
Wash Up Cleaner	43	430	4.70	0.10	1.00
Paint Thinners	44	440	7.30	0.16	1.60
Wash Up Cleaning Solvents	26	260	4.70	<u>0.06</u>	<u>0.61</u>
	Subtotal, Screen Printing:			<u>1.20</u>	<u>12.30</u>
	Facility Total:			2.28	22.76

Compliance with annual limits will be determined based on the sum of the data for the current month, plus the preceding 11 months.

c. These conditions are based on representations of maximum operation and maximum actual emission rates. Compliance with annual limits shall be determined from a running total of 12 months of data.

4a. This permit is issued based on the combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) being less than 100 lbs/day as determined in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B). Therefore, the requirements of 35 Ill. Adm. Code 218.407 through 218.410 are not applicable to the lithographic printing lines at this source.

b. Pursuant to 35 Ill. Adm. Code 218.411(a)(1)(B) the Permittee shall perform calculations which demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source never exceed 100 lbs/day before the use of capture systems and control devices, as follows:

i. To calculate daily emissions of VOM, the Permittee shall determine the monthly emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) and divide this amount by the number of days during that calendar month that printing lines at the source were in operation;

- ii. To determine the VOM content of the inks, fountain solution additives and cleaning solvents, the test methods and procedures set forth in 35 Ill. Adm. Code 218.409(c) shall be used;
 - iii. To determine VOM emissions from inks used on lithographic printing lines at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing lines; and
 - iv. To determine VOM emissions from fountain solutions and cleaning solvents used on lithographic printing lines at the source, no retention factor is used.
- 5a. Pursuant to 35 Ill. Adm. Code 218.411(a)(2) the Permittee shall collect and record either the information specified in (b) or (c) below for all lithographic printing lines at the source:
- b. Standard recordkeeping, including the following:
 - i. The name and identification of each fountain solution additives, lithographic ink, and cleanup solvent used on any lithographic printing lines, recorded each month;
 - ii. A daily record which shows whether a lithographic printing line at the source was in operation on that day;
 - iii. The VOM content and the volume of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;
 - iv. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month; and
 - v. The VOM emissions in lbs/day for the month, calculated in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B) and Special Condition 4(b).
 - c. Purchase and inventory recordkeeping, including the following:

- i. The name, identification, and VOM content of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;
 - ii. Inventory records from the beginning and end of each month indicating the total volume of each fountain solution additive, lithographic ink, and cleaning solvent to be used on any lithographic printing line at the source;
 - iii. Monthly purchase records for each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line at the source;
 - iv. A daily record which shows whether a lithographic printing line at the source was in operation on that day;
 - v. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month based on the monthly inventory and purchase records required to be maintained pursuant to 35 Ill. Adm. Code 218.411(a)(2)(B)(i), (a)(2)(B)(ii), and (a)(2)(B)(iii) and Special Conditions 5(c)(i), (c)(ii), and (c)(iii); and
 - vi. The VOM emissions in lbs/day for the month, calculated in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B).
- d. The Permittee shall maintain all records required by 35 Ill. Adm. Code 218.411 at the source for a minimum period of three years and shall make all records available to the Illinois EPA upon request.
6. Pursuant to 35 Ill. Adm. Code 218.411(a)(3), the Permittee shall notify the Illinois EPA in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source ever exceed 100 lbs/day, before the use of capture systems and control devices, within 30 days after the event occurs. Such notification shall include a copy of all records of such event.
7. The coatings and inks shall be tested by the VOM content test methods of 25 Ill. Adm. Code 218.105(a).
8. The Permittee shall maintain monthly records of the following items:

- a. Name and I.D. of each coating, ink, and solvent;
 - b. VOM content of each coating, ink, and solvent, as applied; and
 - c. Usage of each coating, ink, and solvent (lb/month, TPY).
9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
11. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

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

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

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

12. Persons with lifetime operating permits must obtain a revised permit for any of the following changes at the source:
- a. An increase in emissions above the amount the emission unit or the source is permitted to emit;

- b. A modification;
- c. A change in operations that will result in the source's noncompliance with conditions in the existing permit; or
- d. A change in ownership, company name, or address, so that the application or existing permit is not longer accurate.

It should be noted that the paper-working operations are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(aa). The space heaters are exempt from state permit requirements, pursuant to 35 Ill. Adm. code 201.146(d).

If you have any questions on this permit, please contact John Blazis at 217/782-2113.

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

DES:JPB:jar

cc: Region 1