

- b. Prior to initial issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
- 3. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
- 4a. This permit is issued based upon the flexographic and letter printing presses not being subject to the VOM control requirements of 35 Ill. Adm. Code 218.401: Flexographic and Rotogravure Printing. This is consequence of the federally enforceable limitations of this permit limiting Potential to Emit and Maximum Theoretical Emissions of VOM to less than applicability threshold of 25 tons per year and 100 tons year, respectively, as established in Section 218.402(a).
- b. The Permittee shall not apply coatings in a manner that the daily weighted average of the coatings, as applied, whose VOM content exceeds 2.3 lb/gallon minus water and other exempted compounds, pursuant to 35 Ill. Adm. Code 218.205(a) and 218.204(c).
- c. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 5. Emissions and operation of the two flexographic printing press and 2 laminating machines shall not exceed the following limits:

<u>Materials</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Lb/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
Coatings	3,624	36,240	3,624	18.12
Inks	396	3,960	396	1.98
Clean-Up Solvents	960	9,600	960	4.80

These limits are based on complete volatilization of the VOM content, material VOM usage = material VOM content x material usage, and the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. Emissions and operation of natural gas combustion shall not exceed the following limits:

<u>Process</u>	<u>Natural Gas Usage</u>		<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>		<u>Factor</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
Natural Gas Combustion	3.2	32	NO _x	100	320	1.60
			CO	84	269	1.34
			PM	7.6	24	0.12
			VOM	5.5	18	0.09
			SO ₂	0.6	2	0.01

These limits are based on standard AP-42 emission factors, natural gas as the only fuel fired in the process and the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 7a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- b. The Permittee shall maintain the following records:
- i. Name, usage (gallons/month and gallons/year), VOM and HAP content (lb/gallon or % weight), VOM and HAP emissions (lb/month and tons/year) for the following materials:

- A. Inks;
 - B. Coatings;
 - C. Adhesives; and
 - D. Solvents
- ii. Daily weighted average VOM content of coatings (as applied) minus water and other exempted compounds each day.
 - iii. Natural gas usage (mmscf/month and mmscf/year); and
 - iv. Monthly and annual emissions of CO, NO_x, PM, SO₂, and VOM with supporting calculations (tons/month and tons/year).
8. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
9. If there is an exceedance of or deviation from 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/deviation. 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 deviation and efforts to reduce emissions and future occurrences.
10. Two (2) copies of required reports and 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
9511 West Harrison
Des Plaines, Illinois 60016

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It should be noted that this permit has been revised to incorporate Construction permit # 06020117 to add one flexographic printing press.

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

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

DES:GMK:psj

cc: Illinois EPA, FOS Region 1

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the printing and lamination operation operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. Limiting the VOM usage of solvents, inks, and coatings, and limiting natural gas usage for the facility. The resulting maximum emissions are below the levels, e.g., 100 tons/year of volatile organic material (VOM), 25 tons/year of total combined hazardous air pollutants (HAPs), and 10 tons/year of any single hazardous air pollutant (HAP) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

EMISSIONS
(Ton/Year)

Material/process	NOx	CO	SO2	PM	VOM	HAP	
						Single	Combined
Coatings					18.12		
Inks					1.98		
Clean-up					4.80		
Natural gas combustion	1.60	1.34	0.01	0.12	0.09		
Total	1.60	1.34	0.01	0.12	24.99	< 10	< 25

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