

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Weber Marking Systems, Inc.  
Attn: Brian Gallagher  
711 West Algonquin Road  
Arlington Heights, Illinois 60005

<u>Application No.:</u> 04070058	<u>I.D. No.:</u> 031009AAS
<u>Applicant's Designation:</u>	<u>Date Received:</u> July 19, 2004
<u>Subject:</u> Label Manufacturing and Printing Plant	
<u>Date Issued:</u> December 29, 2004	<u>Expiration Date:</u> December 29, 2009
<u>Location:</u> 711 West Algonquin Road, Arlington Heights	

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of twenty flexographic printing presses, one glue applicator, four ink mixing tanks, one ink mixer/disperser, photo developing equipment with recovery still, and natural gas fired heating equipment as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
2. This permit is issued based upon the flexographic 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 potential to emit of VOM being limited to less than applicability threshold of 25 tons per year specified in Section 218.401(a)(2).
3. The paper coating operations are subject to VOM emission limitations of 35 Ill. Adm. Code 218.204(c) and VOM content of the coating shall not exceed 2.3 lb/gallon (minus water and any compounds which are specifically exempted from the definition of VOM).
4. VOM emissions from the flexographic printing operations shall not exceed 2.0 tons/month and 16.0 tons/year. The VOM emissions shall be calculated using the following equation:

$$E = \sum M_i \times V_i,$$

where:

E - VOM emissions (Tons);

M<sub>i</sub> - VOM-containing raw materials usage (Tons);

V<sub>i</sub> - VOM content of raw materials (fraction).

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

- 5a. This Permit is issued based upon glue applicator and photo developing equipment not being required to meet the control requirements of 35 Ill. Adm. Code 218.986 by qualifying for the exemption in 218.980(d). To qualify for this exemption, emissions of VOM from glue applicator and photo developing equipment must not exceed 2.5 tons per calendar year and emissions of all emission units combined subject to Subpart TT and not complying with the requirements of 218.986 must not exceed 5.0 tons per calendar year.
- b. The Permittee shall maintain a list of all emission units to which it is applying the 5.0 ton/yr exclusion, that includes:
  - i. Name and identification of each emission unit.
  - ii. Annual volatile organic material emissions (tons/year), with supporting documentation.
6. This permit is issued based on negligible emissions of volatile organic materials from the glue applicator, mixing tanks, mixer/disperser and photo developing equipment. For this purpose, emissions from each emission source or group of emission sources shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
7. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in a rule which would require the Permittee to obtain a CAAPP permit from the Agency. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Agency.
8. Operation and emissions of the natural gas fired heating equipment shall not exceed the following limits:

Natural Gas Usage: 10 mmscf/month, 60 mmscf/year

<u>Pollutant</u>	<u>Emission Factor</u> <u>(Lb/mmscf)</u>	<u>Emissions</u>	
		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Nitrogen Oxides (NO <sub>x</sub> )	100	0.5	3.0
Carbon Monoxide (CO)	84	0.4	2.5
Volatile Organic Materials (VOM)	5.5	0.03	0.2

These limits are based on the maximum equipment operations and standard emission factors given by AP-42. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 months of data.

9. The Permittee shall maintain records of the following items:
  - a. Monthly and annual usage of the inks, coatings, adhesives and clean-up solvents (tons/month, tons/year);
  - b. VOM and HAP contents of the materials used (weight %); and
  - c. VOM and HAP emissions with supporting calculations.
  
10. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
  
11. 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 and Enforcement 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 exceedances or violation and efforts to reduce emissions and future occurrences.
  
12. 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 and Enforcement Section (#40)  
 P.O. Box 19276  
 Springfield, IL 62794-9276

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

Page 4

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

If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

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

DES:VJB:psj

cc: IEPA, FOS Region 1  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from printing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 25 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled 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 used and control measures are more effective than required in this permit.

Emission Units	Emissions (Tons/Year)				
	VOM	NO <sub>x</sub>	CO	Single HAP	Total HAP
Flexographic presses	16.0	--	--	--	--
Glue applicator	0.44	--	--	--	--
Mixers	0.44	--	--	--	--
Mixer/disperser	0.44	--	--	--	--
Photo developer	0.44	--	--	--	--
Combustion equipment	0.2	3.0	2.5	--	--
Plant-Wide				<10	<25
Total	18.01	3.0	2.5	<10	<25

DES:VJB:psj