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1.0 SOURCE IDENTIFICATION

1.1 Source

Brown Printing Company, Woodstock Division  
11595 McConnell Road  
Woodstock, Illinois 60098  
815/334-2078

I.D. No.: 111095ABU  
SIC: 2752, Commercial Printing, Lithographic

1.2 Owner/Parent Company

Gruner + Jahr Printing and Publishing Company  
2300 Brown Avenue  
Waseca, Minnesota 56093

1.3 Operator

Brown Printing Company, Woodstock Division  
11595 McConnell Road  
Woodstock, Illinois 60098

Diane Lee, Environmental Manager  
815/206-6247

1.4 General Source Description

Brown Printing Company, Woodstock Division is located at 11595 McConnell Road in Woodstock. This source is a commercial lithographic printing operation that uses heatset web offset lithographic printing presses, which are all controlled by natural gas fired RTOs, and inkjet printing cabinets. The products produced at this source are trade magazines.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois 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
ATU	Allotment Trading Unit
Btu	British thermal unit
°C	degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
°F	degrees Fahrenheit
ft <sup>3</sup>	cubic feet
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
LAER	Lowest Achievable Emission Rate
lb	pound
Mg	Megagram
mmBtu	million British thermal units
mmft <sup>3</sup>	million cubic feet
mmHg	millimeters of Mercury
MW	Megawatt
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
ppmv	parts per million by volume
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
RMP	Risk Management Plan
RTO	Regenerative Thermal Oxidizer
SIC	Standard Industrial Classification
SIP	State Implementation Plan

SO <sub>2</sub>	Sulfur Dioxide
T	Ton
T1	Title I - identifies Title I conditions that have been carried over from an existing 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 permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
UV	Ultraviolet
VOM	Volatile Organic Material

### 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:

Printing Plate Processors.

- 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:

Perfect Binders each with Glue Pot.

Scrap Paper Baler Systems.

- 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:

None

- 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	Inkjet Printing Cabinets #1-16	3/96 3/98 (Modified)	None
	Inkjet Printing Cabinets #17-32	3/98	None
	Inkjet Printing Cabinets #33-48	7/02	None
02	Heatset Web Offset Lithographic Printing Press #4110/UV Coating Unit with Natural Gas Fired Dryer	3/98 (Press) 3/98 (RTO-1) 3/98 (RTO-2) 2/02 (RTO-3)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3
	Heatset Web Offset Lithographic Printing Press #4120 with Natural Gas Fired Dryer	3/98 (Press)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3
	Heatset Web Offset Lithographic Printing Press #4170 with Natural Gas Fired Dryer	3/98 (Press)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3
	Heatset Web Offset Lithographic Printing Press #4130 with Natural Gas Fired Dryer	3/98 (Press)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3
	Heatset Web Offset Lithographic Printing Press #4140/UV Coating Unit with Natural Gas Fired Dryer	3/98 (Press) 2/02 (UV Coating Unit)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3
	Heatset Web Offset Lithographic Printing Press #4150 with Natural Gas Fired Dryer	3/98 (Press)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3
	Heatset Web Offset Lithographic Printing Press #7 with Natural Gas Fired Dryer	3/98 (Press)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3

Emission Unit	Description	Date Constructed	Emission Control Equipment
02 (Cont.)	Heatset Web Offset Lithographic Printing Press #8 with Natural Gas Fired Dryer	3/98 (Press)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3

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. 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.

5.2.3 Ozone Depleting Substances

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 Risk Management Plan

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 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

#### 5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
  - i. Illinois EPA, Compliance Section; and
  - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
  - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

#### 5.2.7 LAER Compliance Requirement

No person shall cause or allow the operation of a new major stationary source or major modification subject to the requirements of 35 IAC Part 203, Subpart C, except as in compliance with applicable LAER provisions established pursuant to 35 IAC 203.301 for such source or modification [35 IAC 203.601].

#### 5.2.8 Emission Offset Maintenance Requirement

No person shall cause or allow the operation of a new major stationary source or major modification where the owner or operator has demonstrated that it would not interfere with reasonable further progress by providing emission offsets pursuant to 35 IAC 203.302 without maintaining those emission offsets or other equivalent offsets [35 IAC 203.602].

### 5.3 Non-Applicability of Regulations of Concern

- 5.3.1 This permit is issued based on the source not being subject to the NSPS, 40 CFR Part 60, Subpart QQ, Standards of Performance for the Graphic Arts Industry, Publication Rotogravure Printing, because each affected printing line at this source is not a publication rotogravure printing press.

5.3.2 This permit is issued based on the source not being subject to 40 CFR Part 63, Subparts A and KK, the NESHAP for the Printing and Publishing Industry, because the affected printing lines at this source are not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.

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
Nitrogen Oxides (NO <sub>x</sub> )	45.99
Particulate Matter (PM)	3.50
Sulfur Dioxide (SO <sub>2</sub> )	0.27
Volatile Organic Material (VOM)	62.25
HAP, not included in VOM or PM	-----
TOTAL	112.01

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

- a. The total annual emissions of VOM from the affected heatset web offset lithographic printing lines (including VOM emissions from the combustion of natural gas in the press dryers and the RTOs) and the

affected inkjet printing cabinets #1-32 shall not exceed 57.95 tons per year.

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).

The above limitations were established in Permit 97080012, pursuant to 35 IAC Part 203 [T1].

- b. The Permittee shall maintain 75.34 tons of VOM emission reduction credits from other sources in the Chicago ozone non-attainment area such that the total is 1.3 times the VOM emissions allowed from the affected heatset web offset lithographic printing lines (including VOM emissions from the combustion of natural gas in the press dryers and the RTOs) and the affected inkjet printing cabinets #1-32 pursuant to Condition 5.5.3(a).
- c. These VOM emission reduction credits are provided by permanent emission reductions that occurred at the following sources, as listed below. These emission reductions have been relied upon by the Illinois EPA to issue Construction Permit 97080012 and cannot be used for other purposes.

	VOM Emission Reductions <u>(Ton/Year)</u>
Burrell-Leder Beltech, Inc., Skokie I.D. No.: 031288AGR Process Change	-22.9
Handy Button Machine Company, Melrose Park I.D.No.: 031186AFR Process Change	-32.0
Hargro, Chicago I.D. No.: 031600CPO Shutdown of Printing	<u>-20.5</u>
Total	-75.4

Conditions 5.5.3(b) and (c) represent the actions identified in conjunction with the construction of the affected heatset web offset lithographic printing lines (including VOM emissions from the combustion of natural gas in the press dryers and the RTOs) and the affected inkjet printing cabinets #1-32 to ensure that the VOM emissions from the affected heatset web

offset lithographic printing lines (including VOM emissions from the combustion of natural gas in the press dryers and the RTOs) and the affected inkjet printing cabinets #1-32 do not interfere with reasonable further progress.

## 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 Conditions 5.5.1 and 5.5.3(a), pursuant to Section 39.5(7)(b) of the Act:

- a. Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.
- b. Total annual emissions of VOM on a monthly basis for the affected heatset web offset lithographic printing lines (including VOM emissions from the combustion of natural gas in the press dryers and the RTOs) and the affected inkjet printing cabinets #1-32 (ton/year).

### 5.6.2 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 deviations of the source 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. Annual emissions from the source in excess of the emission limits specified in Condition 5.5.1, within 30 days of such an occurrence.
- b. Annual emissions of VOM from the affected heatset web offset lithographic printing lines (including VOM emissions from the combustion of natural gas in the press dryers and the RTOs) and the affected inkjet printing cabinets #1-32 in excess of the emission limits specified in Condition 5.5.3(a), based on the current month's records plus the preceding 11 months, within 30 days of such an occurrence.

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

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Permitted 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 EMISSIONS 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 reasonable further 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. 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 in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions 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 emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 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 permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year

being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.3 Contingent Allotments for New or Modified Emission Units

The source was issued a construction permit prior to January 1, 1998 for the following new or modified emission units for which three years of operational data is not yet available:

Emission Unit	Construction Permit No.	Date Issued	Maximum Available Allotment	Explanation of Maximum Allotment
Inkjet Printing Cabinets #1-32	97080012	3/10/98	6.80	Monthly Limit x 5 Months
Heatset Web Offset Lithographic Printing Presses #4110, 4120, 4170, 4130, 4140, 4150, 7, and 8 each with Natural Gas Fired Dryer all Controlled by Natural Gas Fired RTO-1 and RTO-2	97080012	3/10/98	17.45	Monthly Limit x 5 Months

In accordance with 35 IAC 205.310(h) and 35 IAC 205.320(f), the source shall submit a written request for, or an application for, an emissions baseline and allotment which address these emission units by December 1 of the year of the third complete seasonal allotment period in which each such newly constructed or modified emission unit is operational. Such submittal shall include information from the affected emission units on the seasonal emissions for these first three seasonal allotment periods.

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units:

Emission Unit	Construction Permit No.	Date Issued
Natural Gas Fired RTO-3	02010046	2/6/02
UV Coating Unit #4140	02010046	2/6/02
Inkjet Printing Cabinets #33-48	02040102	7/18/02

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

#### 6.4 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
  - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
  - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
  - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 Inkjet Printing Cabinets

7.1.1 Description

Inkjet printing cabinets are used in the Bindery Department to apply a small address label to magazines while they are being bound. The inkjet printing cabinets do not utilize any emission control equipment.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	Inkjet Printing Cabinets #1-16	None
	Inkjet Printing Cabinets #17-32	None
	Inkjet Printing Cabinets #33-48	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected printing lines" for the purpose of these unit-specific conditions, are Inkjet Printing Cabinets, which are not rotogravure, flexographic, or lithographic printing presses, have less than 90.7 Mg (100 tons) of maximum theoretical emissions of VOM per calendar year, are limited to less than 90.7 Mg (100 tons) of uncontrolled VOM emissions per calendar year in this CAAPP permit, and have less than 22.7 Mg (25 tons) aggregate potential emissions of VOM per year.
- b. The VOM composite partial vapor pressure of any material used on any affected printing line shall not exceed 71 mmHg at 20°C (1.37 psia at 68°F). This emission limitation was established in Permit 97080012 and represents LAER for emissions of VOM as applied to the affected printing lines [35 IAC 203.301].

7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected printing lines not being subject to the NSPS, 40 CFR Part 60, Subpart QQ, Standards of Performance for the Graphic Arts Industry, Publication Rotogravure Printing, because each affected printing line is not a publication rotogravure printing press.
- b. This permit is issued based on the affected printing lines not being subject to 40 CFR Part 63, Subparts A and KK, the NESHAP for the Printing and Publishing Industry, because the affected printing lines are not

publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.

- c. This permit is issued based on the affected printing lines not being subject to 40 CFR Part 64, CAM for Major Stationary Sources, because each affected printing line does not use an add-on control device to achieve compliance with an emission limitation or standard.
- d. This permit is issued based on the affected printing lines not being subject to 35 IAC 218.301 and 218.302, Use of Organic Material, because each affected printing line does not use a material that creates an odor nuisance and that is considered as a photochemically reactive material, as defined in 35 IAC 211.4690.
- e. This permit is issued based on the affected printing lines not being subject to 35 IAC Part 218, Subpart H, Printing and Publishing, because each affected printing line is not a flexographic, rotogravure, or lithographic printing line.
- f. This permit is issued based on the affected printing lines not being subject to 35 IAC Part 218, Subpart TT, Other Emission Units, because the affected printing lines do not have maximum theoretical emissions of 90.7 Mg (100 tons) or more per calendar year of VOM and are limited to less than 90.7 Mg (100 tons) of VOM emissions per calendar year in the absence of air pollution control equipment through production or capacity limitations contained in this federally enforceable permit pursuant to 35 IAC 218.980(a)(1), and the affected printing lines do not have the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate pursuant to 35 IAC 218.980(b)(1).

#### 7.1.5 Operating Requirements

The affected printing lines shall only be used for "insert" printing on printed materials, e.g., adding individual names and addresses to material in the Bindery Department.

#### 7.1.6 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:

- a. Emissions of VOM from each affected printing line shall not exceed 150 pounds per month, average, for all affected printing lines at this source. The above emission limitation was established in Permit 97080012 and represents LAER for emissions of VOM as applied to the affected printing lines [35 IAC 203.301].
- b. Emissions of VOM from affected printing lines #1-32 shall not exceed 1.75 tons per month and 13.8 tons per year. These emission limits are based on the maximum material usage, the maximum VOM contents, and the formula in Condition 7.1.12(c).

The above limitations were established in Permit 97080012, pursuant to 35 IAC Part 203 [T1].

- c. Emissions of VOM from affected printing lines #33-48 shall not exceed 0.43 tons per month and 4.3 tons per year. These emission limits are based on the maximum material usage, the maximum VOM contents, and the formula in Condition 7.1.12(c).

The above limitations were established in Permit 02040102, 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].

- d. 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).

#### 7.1.7 Testing Requirements

- a. Testing to demonstrate compliance with the emission limitation in Condition 7.1.3(b) and to determine the VOM composite partial vapor pressure of each material shall be conducted upon request of the Illinois EPA in accordance with the applicable methods and procedures specified in 35 IAC 218.110.
- b. Testing to determine the VOM content of each material shall be conducted by the Permittee upon request of the Illinois EPA, as follows:
  - i. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used; provided, however, Method 24, 40 CFR Part 60, Appendix A, shall be used to demonstrate compliance; or

- ii. The manufacturer's specifications for VOM content for each material 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, 40 CFR Part 60, Appendix A, shall be used to determine compliance.

7.1.8 Monitoring Requirements

None

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 printing line to demonstrate compliance with Conditions 5.5.1, 5.5.3, 7.1.3, 7.1.6, and 7.1.7, pursuant to Section 39.5(7)(b) of the Act:

- a. The name and identification of each material used;
- b. The VOM composite partial vapor pressure of each material used, as determined in accordance with the testing requirements of Condition 7.1.7(a) (mmHg at 20°C);
- c. Records of the testing of the VOM content of each material, as determined in accordance with the testing requirements of Condition 7.1.7(b), which include the following [Section 39.5(7)(e) of the Act]:
  - i. Identification of material tested;
  - ii. Results of analysis (percent by weight);
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.
- d. The amount of each material used (lb/month and lb/year). This information may be estimated from the total amount of each material used by all affected printing lines, using the ratio of the number of affected printing lines in a specific group for emission limitation purposes and the total number of affected printing lines;
- e. The VOM and HAP content of each material used (percent by weight);

- f. The number of affected printing lines in operation each month;
- g. The average monthly VOM emissions, based on the usage and VOM content of each material used, the number of affected printing lines in operation each month, and the compliance procedures in Condition 7.1.12(b), with supporting calculations (lb/month);
- h. The monthly and annual aggregate VOM emissions, based on the usage and VOM content of each material used and the compliance procedures in Condition 7.1.12(c), with supporting calculations (ton/month and ton/year); and
- i. The monthly and annual aggregate HAP emissions of each individual HAP and the total of all HAPs combined, based on the usage and HAP content of each material used and the compliance procedures in Condition 7.1.12(c), with supporting calculations (ton/month and ton/year).

#### 7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected printing 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. An owner or operator of an affected printing line subject to the emission limitation of Condition 7.1.3(b) shall notify the Illinois EPA in writing of any violation of the emission limitation of Condition 7.1.3(b) within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation.
- b. Emissions of VOM in excess of the monthly emission limit specified in Condition 7.1.6(a), within 30 days of such an occurrence.
- c. Emissions of VOM in excess of the emission limits specified in Conditions 7.1.6(b), and/or (c), based on the current month's records plus the preceding 11 months, within 30 days of such an occurrence.

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the formulas listed below:

- a. Compliance with the VOM emission limit in Condition 7.1.3(b) is addressed by the testing requirements in Condition 7.1.7(a), the recordkeeping requirements in Conditions 7.1.9(a) and (b), and the reporting requirements in Condition 7.1.10(a).
- b. Compliance with the VOM emission limit in Condition 7.1.6(a) from each affected printing line shall be based on the testing requirements in Condition 7.1.7(b), the recordkeeping requirements in Conditions 7.1.9(a), (c), (d), (e), (f), and (g), the reporting requirements in Condition 7.1.10(b), and the formula listed below:

$$\text{VOM Emissions (lb)} = (\text{Usage of each Material, lb}) \times [(\text{VOM Content of each Material Used, percent by weight}) / 100] / (\text{Number of Affected Printing Lines in Operation})$$

- c. Compliance with the VOM emission limits in Conditions 5.5.1, 5.5.3(a), 7.1.6(b), and 7.1.6(c), and to determine HAP emissions from the affected printing lines shall be based on the testing requirements in Condition 7.1.7(b), the recordkeeping requirements in Conditions 7.1.9(a), (c), (d), (e), (h), and (i), the reporting requirements in Condition 7.1.10(c), and the formula listed below:

$$\text{VOM and HAP Emissions (ton)} = (\text{Usage of each Material, lb}) \times [(\text{VOM and HAP Content of each Material Used, percent by weight}) / 100] \times (\text{ton}/2000 \text{ lb})$$

7.2 Unit 02 Heatset Web Offset Lithographic Printing Presses  
Control Natural Gas Fired RTOs

7.2.1 Description

The heatset web offset lithographic printing presses are used to print magazine forms to be bound into trade magazines. The presses use the heatset web offset lithographic printing process to transfer inked images from the plate to the impression roller then onto the paper with the aid of fountain solutions. The inked paper then passes through a dryer and 80% of the ink solvent is flashed off by the heat. The flashed off ink solvent is then transported to the RTOs and oxidized. Part of the fountain solution and automatic blanket wash solvent emissions are also captured by the dryer and controlled by the RTOs. All press dryer VOM emissions are funneled into a common duct and then split into RTO-1, RTO-2, or RTO-3, depending on air flow. Each heatset web offset lithographic printing press dryer and each RTO burn natural gas as the fuel. Emissions of NO<sub>x</sub>, CO, PM, and SO<sub>2</sub> result from the combustion of natural gas in the press dryers and the RTOs. The UV coating contains no VOM.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Rated Heat Input Capacity (mmBtu/hr)	Emission Control Equipment
02	Heatset Web Offset Lithographic Printing Press #4110/UV Coating Unit with Natural Gas Fired Dryer	4.6 (Dryer)	Natural Gas Fired RTO-1
		8.0 (RTO-1)	Natural Gas Fired RTO-2
		8.0 (RTO-2)	Natural Gas Fired RTO-3
		4.0 (RTO-3)	Natural Gas Fired RTO-3
	Heatset Web Offset Lithographic Printing Press #4120 with Natural Gas Fired Dryer	13.2 (Dryer)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3
	Heatset Web Offset Lithographic Printing Press #4170 with Natural Gas Fired Dryer	13.2 (Dryer)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3
	Heatset Web Offset Lithographic Printing Press #4130 with Natural Gas Fired Dryer	9.2 (Dryer)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3

Emission Unit	Description	Rated Heat Input Capacity (mmBtu/hr)	Emission Control Equipment
02 (Cont.)	Heatset Web Offset Lithographic Printing Press #4140/UV Coating Unit with Natural Gas Fired Dryer	13.2 (Dryer)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3
	Heatset Web Offset Lithographic Printing Press #4150 with Natural Gas Fired Dryer	13.2 (Dryer)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3
	Heatset Web Offset Lithographic Printing Press #7 with Natural Gas Fired Dryer	9.2 (Dryer)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3
	Heatset Web Offset Lithographic Printing Press #8 with Natural Gas Fired Dryer	9.2 (Dryer)	Natural Gas Fired RTO-1 Natural Gas Fired RTO-2 Natural Gas Fired RTO-3

### 7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected printing lines" for the purpose of these unit-specific conditions, are Heatset Web Offset Lithographic Printing Presses each with Natural Gas Fired Dryer all controlled by Natural Gas Fired RTOs, with total maximum theoretical emissions of VOM from all heatset web offset lithographic printing lines (including solvents used for cleanup operations associated with the heatset web offset lithographic printing lines) at the source greater than 90.7 Mg (100 tons) per calendar year before the application of capture systems and control devices and there are no federally enforceable permit conditions or SIP revision for all heatset web offset lithographic printing lines at the source that limit production or capacity of these printing lines to less than 90.7 Mg/year (100 ton/year) of total VOM emissions before the application of capture systems and control devices pursuant to 35 IAC 218.405(d)(1), with combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) greater than 45.5 kg/day (100 lb/day) before the application of capture

systems and control devices pursuant to 35 IAC 218.405(d)(2), for which construction or modification commenced on or after April 14, 1972, with less than 100 mmBtu/hr of heat input, and burn natural gas exclusively.

- b. Each affected printing line is subject to the emission limits identified in Condition 5.2.2(b).
- c. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any affected printing line, which, either alone or in combination with the emission of PM from all other affected printing lines, for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c) (Attachment 1) [35 IAC 212.321(a)].
- d. No person shall cause or allow the emission of SO<sub>2</sub> into the atmosphere from any affected printing line to exceed 2000 ppm [35 IAC 214.301].
- e. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any affected printing line, except as provided in the control requirements of 35 IAC 218.302 (Condition 7.2.5(b)) and the following exception: If no odor nuisance exists, the emission limitation of 35 IAC Part 218, Subpart G, Use of Organic Material, shall apply only to photochemically reactive material [35 IAC 218.301].
- f. No owner or operator of affected printing lines shall cause or allow the operation of any affected printing line unless the total VOM content in the as-applied fountain solution is 2 percent or less, by volume, and the as-applied fountain solution contains no alcohol.

This emission limitation was established in Permit 97080012, is more stringent than the emission limitation of 35 IAC 218.407(a)(1)(A)(iii), and represents LAER for emissions of VOM as applied to the affected printing lines [35 IAC 203.301].

- g. No owner or operator of affected printing lines shall cause or allow the use of a cleaning solution on any affected printing line unless [35 IAC 218.407(a)(4)]:

These emission limitations were established in Permit 97080012 and represent LAER for emissions of VOM as

applied to the affected printing lines [35 IAC 203.301].

- i. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 5 mmHg at 20°C (0.09 psia at 68°F), and the as-used cleaning solution contains no alcohol; or
- ii. The VOM content of the as-used cleaning solution is less than or equal to 30 percent, by weight [35 IAC 218.407(a)(4)(A)]; and
- iii. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (0.19 psia at 68°F) [35 IAC 218.407(a)(4)(B)].

#### 7.2.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected printing lines not being subject to the NSPS, 40 CFR Part 60, Subpart QQ, Standards of Performance for the Graphic Arts Industry, Publication Rotogravure Printing, because each affected printing line is not a publication rotogravure printing press.
- b. This permit is issued based on the affected printing lines not being subject to 40 CFR Part 63, Subparts A and KK, the NESHAP for the Printing and Publishing Industry, because the affected printing lines are not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.
- c. This permit is issued based on the affected printing lines not being subject to 35 IAC 212.324, Process Emission Units in Certain Areas, because the source is not located in a non-attainment area for PM<sub>10</sub>, as designated in 35 IAC 212.324(a)(1).
- d. This permit is issued based on the press dryers and the RTOs associated with the affected printing lines not being subject to 35 IAC 216.121, Emissions of CO from Fuel Combustion Emission Units, because the press dryers and the RTOs are not by definition fuel combustion emission units.
- e. This permit is issued based on the press dryers and the RTOs associated with the affected printing lines not being subject to 35 IAC 217.121, Emissions of NO<sub>x</sub> from New Fuel Combustion Emission Units, because the actual heat input of each press dryer and each RTO is less than 73.2 MW (250 mmBtu/hr) and the press dryers

and the RTOs are not by definition fuel combustion emission units.

- f. This permit is issued based on the affected printing lines not being subject to 35 IAC 218.204(c), Paper Coating Operations, because the paper coating emission limitation does not apply to an affected printing line on which printing is performed and the affected printing line complies with the emission limitations in 35 IAC Part 218, Subpart H, Printing and Publishing, pursuant to 35 IAC 218.204(c).
- g. This permit is issued based on the affected printing lines not being subject to 35 IAC Part 218, Subpart TT, Other Emission Units, because the affected printing lines are included within the source category specified in 35 IAC Part 218, Subpart H, Printing and Publishing, pursuant to 35 IAC 218.980(a)(2) and (b)(2)(A), the affected printing lines are regulated by 35 IAC Part 218, Subpart H, Printing and Publishing, pursuant to 35 IAC 218.980(b)(1)(A), and the affected printing lines are included in the offset lithography source category, pursuant to 35 IAC 218.980(b)(1)(B) and (b)(2)(B).

#### 7.2.5 Control and Operating Requirements and Work Practices

- a. Notwithstanding 35 IAC 218.107, seasonal shutdown of the natural gas fired RTOs and capture system from November 1 through March 31 of the following year is not allowed.
- b. Emissions of organic material in excess of those permitted by the emission limitation of 35 IAC 218.301 (Condition 7.2.3(e)) are allowable if such emissions are controlled by regenerative thermal oxidation so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 218.302(a)].
- c. No owner or operator of affected printing lines shall cause or allow the operation of any affected printing line unless [35 IAC 218.407(a)(1)]:
  - i. The air pressure in the dryer is maintained lower than the air pressure of the press room, such that air flow through all openings in the dryer, other than the exhaust, is into the dryer at all times when the affected printing line is operating [35 IAC 218.407(a)(1)(B)];

This control requirement was established in Permit 97080012 and represents LAER for

emissions of VOM as applied to the affected printing lines [35 IAC 203.301].

- ii. A RTO is installed and operated so that VOM emissions (excluding methane and ethane) from the press dryer exhaust(s) are reduced by 98 percent, by weight, and the RTO is operated at a combustion chamber temperature of 1500°F, unless 99 percent, by weight, destruction is demonstrated;

This control requirement was established in Permit 97080012, is more stringent than the control requirement of 35 IAC 218.407(a)(1)(C), and represents LAER for emissions of VOM as applied to the affected printing lines [35 IAC 203.301].

- iii. Each RTO is equipped with the applicable monitoring equipment specified in the monitoring requirements of 35 IAC 218.105(d)(2) (Condition 7.2.8(a)) and the monitoring equipment is installed, calibrated, operated, and maintained, including maintaining necessary parts for routine repairs of the monitoring equipment, according to manufacturer's specifications at all times when each RTO is in use [35 IAC 218.407(a)(1)(D) and 40 CFR 64.6(c)(1)(iii), (c)(3), 64.7(b), and (c)]; and

- iv. At least one of the RTOs is operated at all times when an affected printing line is in operation, and either RTO-1 and RTO-2 or at least RTO-3 is operated at all times when four or more affected printing lines are in operation [35 IAC 218.407(a)(1)(E)].

- d. No owner or operator of affected printing lines shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any affected printing line to be kept, stored, or disposed of in any manner other than in closed containers [35 IAC 218.407(a)(5)].

This work practice requirement was established in Permit 97080012 and represents LAER for emissions of VOM as applied to the affected printing lines [35 IAC 203.301].

- e. A RTO combustion chamber shall be preheated to the required operating temperature before the printing process is begun, and this temperature shall be maintained as an hourly average during operation of

the affected printing lines. The required operating temperature for the combustion chamber shall be consistent with the average operating temperature during testing demonstrating compliance with the control requirements of Condition 7.2.5(c)(ii), that is, if the emissions test is performed at a set point temperature higher than 1500°F in order to demonstrate 98 percent, by weight, destruction, or 99 percent, by weight, destruction is shown at a lower set point temperature, that higher or lower set point temperature during testing shall be the minimum set point temperature. (The set point for the temperature controller may be 25°F higher to allow for fluctuations, but achieve the hourly average. That is, a recorded temperature of 1525°F during a test will be considered 1500°F.) An excursion is defined as an hourly average operating temperature that is less than 1500°F and is considered to be an exceedance of the control requirements of Condition 7.2.5(c)(ii) [40 CFR 64.6(c)(1)(iii) and (c)(2)].

- f. Operation of the affected printing lines with excess emissions during malfunction or breakdown of the RTOs is not allowed.
- g. The Permittee shall follow good operating practices for each RTO, including periodic inspection, routine maintenance, and prompt repair of defects.
- h. The affected printing lines shall only be operated with natural gas as the fuel in each press dryer and each RTO.
- i. The usage of ink by the affected printing lines, in total, shall not exceed 1,060,518 pounds per month and 8,484,144 pounds per year. 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).
- j. The Permittee shall perform annual burner inspections on each RTO. An excursion is defined as the failure to perform an annual burner inspection on a RTO [40 CFR 64.6(c)(1)(i), (ii), (iii), and (c)(2)].

#### 7.2.6 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:

- a. The VOM content of each ink and fountain solution used on the affected printing lines shall not exceed 40 percent, by weight, and 10 percent, by weight.

- b. Emissions of VOM from the affected printing lines, in total, shall not exceed 5.30 tons per month and 41.79 tons per year. These emission limits are based on the maximum material usage, the maximum VOM contents, 20% by weight ink solvent retention in the web and the remaining 80% evaporated in the dryer, 98% by weight overall control (100% by weight capture and 98% by weight destruction) of ink VOM emissions, 68.6% by weight overall control (70% by weight capture and 98% by weight destruction) of fountain solution VOM emissions, 39.2% by weight overall control (40% by weight capture and 98% by weight destruction) of automatic blanket wash VOM emissions, 50% by weight manual blanket wash solvent retention in the rags and the remaining 50% evaporated into the atmosphere, and the formulas in Condition 7.2.12(i).

The above limitations were established in Permit 97080012, pursuant to 35 IAC Part 203 [T1].

- c. Emissions of VOM from the combustion of natural gas in the press dryers and the RTOs of the affected printing lines, in total, shall not exceed 0.2 tons per month and 2.36 tons per year. These emission limits are based on the maximum natural gas consumption and the applicable emission factor from Condition 7.2.12(h).

The above limitations were established in Permit 97080012, pursuant to 35 IAC Part 203 [T1].

- d. 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).

#### 7.2.7 Testing Requirements

- a. Testing to demonstrate compliance with the emission limitations and control requirements of Conditions 7.2.3(f), (g)(i), and 7.2.5(c)(ii), and 35 IAC 218.407 (Conditions 7.2.3(g)(ii), (g)(iii), and 7.2.5(c)(i)) shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting such testing to allow the Illinois EPA to be present during such testing [35 IAC 218.409(a)].
- b. The methods and procedures of 35 IAC 218.105(d) and (f) shall be used for testing to demonstrate

compliance with the control requirements of Condition 7.2.5(c)(ii), as follows [35 IAC 218.409(b)]:

- i. To select the sampling sites, Method 1 or 1A, as appropriate, 40 CFR Part 60, Appendix A. The sampling sites for determining efficiency in reducing VOM from the dryer exhaust shall be located between the dryer exhaust and the RTO inlet, and between the outlet of the RTO and the exhaust to the atmosphere [35 IAC 218.409(b)(1)];
- ii. To determine the volumetric flow rate of the exhaust stream, Method 2, 2A, 2C, or 2D, as appropriate, 40 CFR Part 60, Appendix A [35 IAC 218.409(b)(2)];
- iii. To determine the VOM concentration of the exhaust stream entering and exiting the RTO, Method 25 or 25A, as appropriate, 40 CFR Part 60, Appendix A. For a RTO, Method 25 must be used except under the following circumstances, in which case Method 25A must be used [35 IAC 218.409(b)(3)]:
  - A. The allowable outlet concentration of VOM from the RTO is less than 50 ppmv, as carbon [35 IAC 218.409(b)(3)(A)];
  - B. The VOM concentration at the inlet of the RTO and the required level of control result in exhaust concentrations of VOM of 50 ppmv, or less, as carbon [35 IAC 218.409(b)(3)(B)]; and
  - C. Due to the high efficiency of the RTO, the anticipated VOM concentration at the RTO exhaust is 50 ppmv or less, as carbon, regardless of inlet concentration. If the source elects to use Method 25A under this option, the exhaust VOM concentration must be 50 ppmv or less, as carbon, and the required destruction efficiency must be met for the source to have demonstrated compliance. If the Method 25A test results show that the required destruction efficiency apparently has been met, but the exhaust concentration is above 50 ppmv, as carbon, a retest is required. The retest shall be conducted using either Method 25 or Method 25A. If the retest is conducted using Method 25A and the test results again show that the

required destruction efficiency apparently has been met, but the exhaust concentration is above 50 ppmv, as carbon, the source must retest using Method 25 [35 IAC 218.409(b)(3)(C)].

- iv. Notwithstanding the criteria or requirements in Method 25, which specifies a minimum probe temperature of 129°C (265°F), the probe must be heated to at least the gas stream temperature of the dryer exhaust, typically close to 176.7°C (350°F) [35 IAC 218.409(b)(4)];
  - v. During testing, the affected printing line(s) shall be operated at representative operating conditions and flow rates [35 IAC 218.409(b)(5)]; and
  - vi. During testing, an air flow direction indicating device, such as a smoke stick, shall be used to demonstrate 100 percent emissions capture efficiency for the dryer, in accordance with the control requirements of 35 IAC 218.407(a)(1)(B) (Condition 7.2.5(c)(i)) [35 IAC 218.409(b)(6)].
- c. Testing to demonstrate compliance with the VOM content emission limitations in Condition 7.2.3(f), 35 IAC 218.407(a)(4)(A) (Condition 7.2.3(g)(ii)), and Condition 7.2.6(a), and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks, shall be conducted upon request of the Illinois EPA, as follows [35 IAC 218.409(c)]:
- i. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used; provided, however, Method 24, 40 CFR Part 60, Appendix A, shall be used to demonstrate compliance [35 IAC 218.409(c)(1)]; or
  - ii. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, and inks 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, 40 CFR Part 60, Appendix A, shall be used to determine compliance [35 IAC 218.409(c)(2)].
- d. Testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent

concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 IAC 218.110 [35 IAC 218.409(e)].

#### 7.2.8 Monitoring Requirements

- a. An owner or operator that uses a RTO to comply with any Section of 35 IAC Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, including maintaining necessary parts for routine repairs of the monitoring equipment, and operated according to vendor specifications at all times the RTO is in use. The continuous monitoring equipment must monitor the combustion chamber temperature of each RTO [35 IAC 218.105(d)(2)(A)(i) and 40 CFR 64.6(c)(1)(i), (iii), (c)(3), 64.7(b), and (c)].
- b. Fountain Solution VOM Content. For fountain solutions to which VOM is added at the source with automatic feed equipment, the owner or operator of any affected printing line(s) subject to the emission limitation of Condition 7.2.3(f) shall determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level. The equipment used to make automatic additions must be installed, calibrated, operated, and maintained in accordance with manufacturer's specifications [35 IAC 218.410(b)(2)].
- c. RTOs For Affected Printing Line(s). If a RTO is used to demonstrate compliance, the owner or operator of an affected printing line subject to the control requirements of Condition 7.2.5(c)(ii) shall [35 IAC 218.410(c)]:
  - i. Install, calibrate, maintain, including maintaining necessary parts for routine repairs of the monitoring equipment, and operate temperature monitoring device(s) with an accuracy of 3°C or 5°F on each RTO in accordance with the monitoring requirements of 35 IAC 218.105(d)(2) (Condition 7.2.8(a)) and in accordance with the manufacturer's specifications. Monitoring shall be performed at all times when a RTO is operating [35 IAC 218.410(c)(1) and 40 CFR 64.6(c)(1)(ii), (iii), (c)(3), 64.7(b), and (c)]; and
  - ii. Install, calibrate, operate, and maintain, including maintaining necessary parts for routine repairs of the monitoring equipment,

in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device(s), such as a strip chart, recorder, or computer, with at least the same accuracy as the temperature monitor [35 IAC 218.410(c)(2) and 40 CFR 64.6(c)(1)(iii), (c)(3), 64.7(b), and (c)].

d. Cleaning Solution [35 IAC 218.410(e)].

i. The owner or operator of any affected printing line relying on the VOM content of the cleaning solution to comply with the emission limitation of 35 IAC 218.407(a)(4)(A) (Condition 7.2.3(g)(ii)) must [35 IAC 218.410(e)(1)]:

A. For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM) [35 IAC 218.410(e)(1)(A)]:

1. Install, operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed [35 IAC 218.410(e)(1)(A)(i)]; and

2. Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with the emission limitation of 35 IAC 218.407(a)(4)(A) (Condition 7.2.3(g)(ii)) [35 IAC 218.410(e)(1)(A)(ii)].

B. For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) as set forth in the recordkeeping requirements of 35 IAC 218.411(d)(2)(B) (Condition 7.2.9(c)(ii)) [35 IAC 218.410(e)(1)(B)].

ii. The owner or operator of any affected printing line relying on the vapor pressure of the cleaning solution to comply with the emission

limitations of Condition 7.2.3(g)(i) or 35 IAC 218.407(a)(4)(B) (Condition 7.2.3(g)(iii)) must keep records for such cleaning solutions used on any such affected printing line(s) as set forth in the recordkeeping requirements of 35 IAC 218.411(d)(2)(C) (Condition 7.2.9(c)(iii)) [35 IAC 218.410(e)(2)].

#### 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 each affected printing line to demonstrate compliance with Conditions 5.5.1, 5.5.3, 7.2.3, 7.2.5, 7.2.6, 7.2.7, and 7.2.8, pursuant to Section 39.5(7)(b) of the Act:

- a. An owner or operator of an affected printing line(s) subject to the control requirements of Condition 7.2.5(c)(ii) shall collect and record daily the following information for each affected printing line subject to the control requirements of Condition 7.2.5(c)(ii) [35 IAC 218.411(b)(3)]:
  - i. RTO monitoring data in accordance with the monitoring requirements of 35 IAC 218.410(c) (Condition 7.2.8(c)) [35 IAC 218.411(b)(3)(A) and 40 CFR 64.6(c)(3) and 64.9(b)(1)];
  - ii. A log of operating time for each RTO, monitoring equipment, and the associated affected printing line [35 IAC 218.411(b)(3)(B)];
  - iii. A maintenance log for each RTO and monitoring equipment detailing all routine and non-routine maintenance performed, including dates and duration of any outages, and any corrective actions taken [35 IAC 218.411(b)(3)(C) and 40 CFR 64.6(c)(1)(iii), (c)(3), and 64.9(b)(1)]; and
  - iv. A log detailing checks on the air flow direction or air pressure of the dryer and press room to insure compliance with the control requirements of 35 IAC 218.407(a)(1)(B) (Condition 7.2.5(c)(i)) at least once per 24-hour period while the affected printing line is operating [35 IAC 218.411(b)(3)(D)].
- b. An owner or operator of an affected printing line subject to the emission limitation of Condition 7.2.3(f) shall collect and record the following

information for each fountain solution [35 IAC 218.411(c)(2)]:

- i. The name and identification of each batch of fountain solution prepared for use on one or more affected printing lines, the affected printing line(s) or centralized reservoir using such batch of fountain solution, and the applicable VOM content emission limitation for the batch [35 IAC 218.411(c)(2)(A)]; and
  - ii. Documentation of the periodic calibration of the automatic feed equipment in accordance with the manufacturer's specifications, including date and time of calibration, personnel conducting, and resultant setting.
- c. For affected printing line cleaning operations, an owner or operator of an affected printing line subject to the emission limitations of Condition 7.2.3(g)(i) or 35 IAC 218.407(a)(4) (Conditions 7.2.3(g)(ii) and (g)(iii)) and the work practice requirements of 35 IAC 218.407(a)(5) (Condition 7.2.5(d)) shall collect and record the following information for each cleaning solution used on each affected printing line [35 IAC 218.411(d)(2)]:
- i. For each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with the emission limitation of 35 IAC 218.407(a)(4)(A) (Condition 7.2.3(g)(ii)), and which is prepared at the source with automatic equipment [35 IAC 218.411(d)(2)(A)]:
    - A. The name and identification of each cleaning solution [35 IAC 218.411(d)(2)(A)(i)];
    - B. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with the testing requirements of 35 IAC 218.409(c) (Condition 7.2.7(c)) [35 IAC 218.411(d)(2)(A)(ii)];
    - C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM) [35 IAC 218.411(d)(2)(A)(iii)];

- D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution [35 IAC 218.411(d)(2)(A)(iv)];
  - E. The VOM content of the as-used cleaning solution, with supporting calculations [35 IAC 218.411(d)(2)(A)(v)]; and
  - F. A calibration log for the automatic equipment, detailing periodic checks [35 IAC 218.411(d)(2)(A)(vi)].
- ii. For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with the emission limitation of 35 IAC 218.407(a)(4)(A) (Condition 7.2.3(g)(ii)), and which is not prepared at the source with automatic equipment [35 IAC 218.411(d)(2)(B)]:
- A. The name and identification of each cleaning solution [35 IAC 218.411(d)(2)(B)(i)];
  - B. Date and time of preparation, and each subsequent modification, of the batch [35 IAC 218.411(d)(2)(B)(ii)];
  - C. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with the testing requirements of 35 IAC 218.409(c) (Condition 7.2.7(c)) [35 IAC 218.411(d)(2)(B)(iii)];
  - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution [35 IAC 218.411(d)(2)(B)(iv)]; and
  - E. The VOM content of the as-used cleaning solution, with supporting calculations [35 IAC 218.411(d)(2)(B)(v)].
- iii. For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with the emission limitations of Condition 7.2.3(g)(i) or 35 IAC 218.407(a)(4)(B) (Condition 7.2.3(g)(iii)) [35 IAC 218.411(d)(2)(C)]:

- A. The name and identification of each cleaning solution [35 IAC 218.411(d)(2)(C)(i)];
  - B. Date and time of preparation, and each subsequent modification, of the batch [35 IAC 218.411(d)(2)(C)(ii)];
  - C. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with the testing requirements of 35 IAC 218.409(e) (Condition 7.2.7(d)) [35 IAC 218.411(d)(2)(C)(iii)];
  - D. The total amount of each cleaning solvent used to prepare the as-used cleaning solution [35 IAC 218.411(d)(2)(C)(iv)]; and
  - E. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with the testing requirements of 35 IAC 218.409(e) (Condition 7.2.7(d)) [35 IAC 218.411(d)(2)(C)(v)].
- iv. The date, time, and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any [35 IAC 218.411(d)(2)(D)].
- d. Records addressing use of good operating practices for each RTO:
    - i. Records for periodic inspection of each RTO with date, individual performing the inspection, nature of inspection, and results of emission testing; and
    - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
  - e. Records of the testing of the capture and destruction efficiency of the capture system and each RTO, as determined in accordance with the testing requirements of Conditions 7.2.7(a) and (b), which include the following [Section 39.5(7)(e) of the Act]:

- i. The date, place, and time of the sampling or measurements;
  - ii. The date(s) any analyses were performed;
  - iii. The name of the company or entity that performed the tests and/or analyses;
  - iv. The test and analytical techniques or methodologies used;
  - v. The results of the tests, including material usage, and/or analyses, including sample calculations; and
  - vi. The operating conditions as existing at the time of the sampling or measurements.
- f. Records of the testing of the VOM content of each ink, fountain solution, automatic blanket wash, and manual blanket wash, as determined in accordance with the testing requirements of Conditions 7.2.7(a) and (c), which include the following [Section 39.5(7)(e) of the Act]:
- i. Identification of material tested;
  - ii. Results of analysis (percent by weight and/or volume);
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.
- g. The amount of each ink, fountain solution, automatic blanket wash, and manual blanket wash used (lb/month and lb/year);
- h. The VOM and HAP content of each ink, fountain solution, automatic blanket wash, and manual blanket wash used (percent by weight);
- i. The natural gas consumption for the press dryers and the RTOs (mmft<sup>3</sup>/month and mmft<sup>3</sup>/year);
- j. The monthly and annual aggregate NO<sub>x</sub>, CO, PM, VOM, and SO<sub>2</sub> emissions from the combustion of natural gas in the press dryers and the RTOs, based on natural gas consumption and the applicable emission factors from Condition 7.2.12(h), with supporting calculations (ton/month and ton/year);

- k. The monthly and annual aggregate VOM emissions, based on the usage and VOM content of each ink, fountain solution, automatic blanket wash, and manual blanket wash used and the compliance procedures in Condition 7.2.12(i), with supporting calculations (ton/month and ton/year);
- l. The monthly and annual aggregate HAP emissions of each individual HAP and the total of all HAPs combined, based on the usage and HAP content of each ink, fountain solution, automatic blanket wash, and manual blanket wash used and the compliance procedures in Condition 7.2.12(i), with supporting calculations (ton/month and ton/year); and
- m. The results of each annual burner inspection on each RTO [40 CFR 64.6(c)(1)(iii)].

#### 7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected printing 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. An owner or operator of an affected printing line(s) subject to the control requirements of Condition 7.2.5(c)(ii) shall comply with the following [35 IAC 218.411(b)]:
  - i. If testing of a RTO is conducted pursuant to the testing requirements of 35 IAC 218.409(b) (Condition 7.2.7(b)), the owner or operator shall, within 90 days after conducting such testing, submit a copy of all test results to the Illinois EPA and shall submit a certification to the Illinois EPA that includes the following [35 IAC 218.411(b)(2)]:
    - A. A declaration that all tests and calculations necessary to demonstrate whether the affected printing line(s) is in compliance with the control requirements of Condition 7.2.5(c)(ii) have been properly performed [35 IAC 218.411(b)(2)(A)];
    - B. A statement whether the affected printing line(s) is or is not in compliance with the control requirements of Condition

7.2.5(c)(ii) [35 IAC 218.411(b)(2)(B)];  
and

C. The operating parameters of the RTO during testing, as monitored in accordance with the monitoring requirements of 35 IAC 218.410(c) (Condition 7.2.8(c)) [35 IAC 218.411(b)(2)(C)].

ii. Notify the Illinois EPA in writing of any violation of the control requirements of Condition 7.2.5(c)(ii) within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation [35 IAC 218.411(b)(4)].

b. An owner or operator of an affected printing line subject to the emission limitation of Condition 7.2.3(f) shall [35 IAC 218.411(c)]:

i. Notify the Illinois EPA in writing of any violation of the emission limitation of Condition 7.2.3(f) within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation [35 IAC 218.411(c)(3)]; and

ii. If changing its method of demonstrating compliance with the applicable VOM content emission limitations in 35 IAC 218.407(a)(1)(A) (Condition 7.2.3(f)), or changing the method of demonstrating compliance with the VOM content emission limitations for fountain solutions pursuant to the monitoring requirements of 35 IAC 218.410(a), (b)(1)(A), (b)(1)(B)(i), or (b)(1)(B)(ii), certify compliance for such new method(s) in accordance with the reporting requirements of 35 IAC 218.411(c)(1), within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such affected printing line(s) will be in compliance with the applicable VOM content emission limitation requirements of 35 IAC 218.407(a)(1)(A) (Condition 7.2.3(f)) [35 IAC 218.411(c)(4)].

c. For affected printing line cleaning operations, an owner or operator of an affected printing line subject to the emission limitations of Condition 7.2.3(g)(i) or 35 IAC 218.407(a)(4) (Conditions

7.2.3(g)(ii) and (g)(iii)) and the work practice requirements of 35 IAC 218.407(a)(5) (Condition 7.2.5(d)) shall notify the Illinois EPA in writing of any violation of the emission limitations of Condition 7.2.3(g)(i) or 35 IAC 218.407(a)(4) (Conditions 7.2.3(g)(ii) and/or (g)(iii)) and/or the work practice requirements of 35 IAC 218.407(a)(5) (Condition 7.2.5(d)) within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation [35 IAC 218.411(d)(3)].

- d. The Permittee shall notify the Illinois EPA within 30 days of a change in fuel combusted in a press dryer and/or a RTO.
- e. Usage of ink in excess of the operating requirements specified in Condition 7.2.5(i), based on the current month's records plus the preceding 11 months, within 30 days of such an occurrence.
- f. VOM content of an ink and/or a fountain solution used in excess of the emission limits specified in Condition 7.2.6(a), within 30 days of such an occurrence.
- g. Emissions of VOM in excess of the emission limits specified in Conditions 7.2.6(b) and/or (c), based on the current month's records plus the preceding 11 months, within 30 days of such an occurrence.
- h. If the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Illinois EPA and, if necessary, submit a proposed significant modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters [40 CFR 64.6(c)(3) and 64.7(e)].
- i. The owner or operator shall submit monitoring reports to the Illinois EPA in accordance with Condition 8.6.1 and shall include, at a minimum, the information required under Condition 8.6.1 and the

following information [40 CFR 64.6(c)(3), 64.9(a)(1), and (2)]:

- i. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken [40 CFR 64.6(c)(3) and 64.9(a)(2)(i)]; and
- ii. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks [40 CFR 64.6(c)(3) and 64.9(a)(2)(ii)].

#### 7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

- a. Compliance with the opacity, PM, and SO<sub>2</sub> emission limits in Conditions 7.2.3(b), (c), and (d) is assumed to be achieved under inherent operating conditions of a natural gas fired press dryer and a natural gas fired RTO, so that no compliance procedures are set in this permit addressing these requirements.
- b. Compliance with the VOM emission limits in Condition 7.2.3(e) is demonstrated by the control requirements in Condition 7.2.5(b).
- c. Compliance with the VOM content emission limit for as-applied fountain solution in Condition 7.2.3(f) is addressed by the testing requirements in Conditions 7.2.7(a) and (c), the monitoring requirements in Condition 7.2.8(b), the recordkeeping requirements in Conditions 7.2.9(b) and (f), and the reporting requirements in Condition 7.2.10(b).
- d. Compliance with the VOM composite partial vapor pressure emission limits for as-used cleaning solution in Conditions 7.2.3(g)(i) or (g)(iii) is addressed by the testing requirements in Conditions 7.2.7(a) and (d), the monitoring requirements in Condition 7.2.8(d)(ii), the recordkeeping requirements in Condition 7.2.9(c)(iii), and the reporting requirements in Condition 7.2.10(c).

- e. Compliance with the VOM content emission limit for as-used cleaning solution in Condition 7.2.3(g)(ii) is addressed by the testing requirements in Conditions 7.2.7(a) and (c), the monitoring requirements in Condition 7.2.8(d)(i), the recordkeeping requirements in Conditions 7.2.9(c)(i), (c)(ii), and (f), and the reporting requirements in Condition 7.2.10(c).
- f. Compliance with the VOM emission control requirements in Conditions 7.2.5(b) and (c) is addressed by proper operation of each RTO, the operating requirements in Conditions 7.2.5(a), (e), and (f), the work practice requirements in Conditions 7.2.5(g) and (j), the testing requirements in Conditions 7.2.7(a) and (b), the monitoring requirements in Conditions 7.2.8(a) and (c), the recordkeeping requirements in Conditions 7.2.9(a), (d), (e), and (m), and the reporting requirements in Conditions 7.2.10(a), (h), and (i).
- g. Compliance with the work practice requirement for the use of closed containers in Condition 7.2.5(d) is addressed by the recordkeeping requirements in Condition 7.2.9(c)(iv) and the reporting requirements in Condition 7.2.10(c).
- h. Compliance with the NO<sub>x</sub>, PM, VOM, and SO<sub>2</sub> emission limits in Conditions 5.5.1, 5.5.3(a), and 7.2.6(c), and the operating requirements in Condition 7.2.5(h), from the combustion of natural gas in the press dryers and the RTOs, shall be based on the recordkeeping requirements in Conditions 7.2.9(i) and (j), the reporting requirements in Conditions 7.2.10(d) and (g), and the emission factors and formula listed below:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/mmft<sup>3</sup>)</u>
NO <sub>x</sub>	100
CO	84
PM	7.6
VOM	5.5
SO <sub>2</sub>	0.6

These are the emission factors for uncontrolled natural gas combustion in small boilers with less than 100 mmBtu/hr of heat input, Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, March, 1998.

$$\text{Combustion Emissions (ton)} = (\text{Natural Gas Consumption, mmft}^3) \times (\text{The Applicable Emission Factor, lb/mmft}^3) \times (\text{ton}/2000 \text{ lb})$$

- i. Compliance with the VOM emission limits in Conditions 5.5.1, 5.5.3(a), 7.2.6(a), and (b), and to determine HAP emissions from the affected printing lines, shall be based on the control requirements in Condition 7.2.5(c)(ii), the operating requirements in Condition 7.2.5(i), the testing requirements in Condition 7.2.7(c), the recordkeeping requirements in Conditions 7.2.9(f), (g), (h), (k), and (l), the reporting requirements in Conditions 7.2.10(e), (f), and (g), and the formulas listed below:

Ink VOM and HAP Emissions ( $E_I$ ):

$$E_I = (U_I)(VC_I/100)(1-R_I/100)[1-(CE_I/100)(DE/100)]$$

Fountain Solution VOM and HAP Emissions ( $E_{FS}$ ):

$$E_{FS} = (U_{FS})(VC_{FS}/100)[1-(CE_{FS}/100)(DE/100)]$$

Automatic Blanket Wash VOM and HAP Emissions ( $E_{ABW}$ ):

$$E_{ABW} = (U_{ABW})(VC_{ABW}/100)[1-(CE_{ABW}/100)(DE/100)]$$

Manual Blanket Wash VOM and HAP Emissions ( $E_{MBW}$ ):

$$E_{MBW} = (U_{MBW})(VC_{MBW}/100)(1-R_{MBW}/100)$$

Total VOM and HAP Emissions ( $E_T$ ):

$$E_T = (E_I + E_{FS} + E_{ABW} + E_{MBW})(\text{ton}/2000 \text{ lb})$$

Where:

$E_I$  = Ink VOM and HAP emissions (lb)

$U_I$  = Amount of each ink used (lb)

$VC_I$  = VOM and HAP content of each ink used (percent by weight)

$R_I$  = 20% by weight ink VOM and HAP retention in the web, based on USEPA's Alternative Control Techniques Document for Offset Lithographic Printing, November 8, 1993

$CE_I$  = 100% by weight ink VOM and HAP emissions capture efficiency by each press dryer and each RTO

$DE$  = Average VOM and HAP emissions destruction efficiency of the RTOs, as determined from the most recent compliance test (percent by weight)

$E_{FS}$  = Fountain solution VOM and HAP emissions (lb)

$U_{FS}$  = Amount of each fountain solution used (lb)

$VC_{FS}$  = VOM and HAP content of each fountain solution used (percent by weight)

$CE_{FS}$  = 70% by weight fountain solution VOM and HAP emissions capture efficiency by each press dryer and each RTO, based on USEPA's Alternative Control Techniques Document for Offset Lithographic Printing, June, 1994

$E_{ABW}$  = Automatic blanket wash VOM and HAP emissions (lb)

$U_{ABW}$  = Amount of each automatic blanket wash used (lb)

$VC_{ABW}$  = VOM and HAP content of each automatic blanket wash used (percent by weight)

$CE_{ABW}$  = 40% by weight automatic blanket wash VOM and HAP emissions capture efficiency by each press dryer and each RTO, based on USEPA's Alternative Control Techniques Document for Offset Lithographic Printing, June, 1994

$E_{MBW}$  = Manual blanket wash VOM and HAP emissions (lb)

$U_{MBW}$  = Amount of each manual blanket wash used (lb)

$VC_{MBW}$  = VOM and HAP content of each manual blanket wash used (percent by weight)

$R_{MBW}$  = 50% by weight manual blanket wash VOM and HAP retention in the rags, based on USEPA's Alternative Control Techniques Document for Offset Lithographic Printing, June, 1994

$E_T$  = Total VOM and HAP emissions (ton)

## 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 September 18, 2002 (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 that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;

- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. 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. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. 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;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. 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

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, 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  
9511 West Harrison  
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 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)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- 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 authorized by this permit; 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 authorized by this permit.

#### 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 annual compliance certifications. The compliance

certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. 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)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Emissions of Particulate Matter from New Process Emission Units

10.1.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- 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, 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 35 IAC 212.321(c) [35 IAC 212.321(a)].
- b. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation [35 IAC 212.321(b)]:

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

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	lb/hr
A	1.214	2.54
B	0.534	0.534

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

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

- c. Limits for Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/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
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.2 Attachment 2 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: \_\_\_\_\_

### 10.3 Attachment 3 Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
  - Corrects typographical errors;
  - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - Requires more frequent monitoring or reporting by the Permittee;
  - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
  - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification
  - Do not violate any applicable requirement;
  - Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

### 3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



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

<b>Application For Construction Permit (For CAAPP Sources Only)</b>	<b>For Illinois EPA use only</b>
	ID number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

<b>Source Information</b>		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. ID number:

<b>Owner Information</b>		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

<b>Operator Information (if different from owner)</b>		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

<b>Applicant Information</b>	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

<b>Summary Of Application Contents</b>	
24. Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25. Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26. Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28. Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29. If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

<b>Signature Block</b>	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

## 10.5 Attachment 5 Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

WDM:psj