

217/782-2113

"REVISED"
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Premium Promotions, Inc./DBA Comark-Bates
Attn: Paul McDonough
770 Arthur Avenue
Elk Grove Village, Illinois 60007

Application No.: 84030001

I.D. No.: 031440AHA

Applicant's Designation:

Date Received: May 5, 2000

Subject: Printing Presses

Date Issued: May 25, 2000

Expiration Date: July 14, 2002

Location: 770 Arthur Avenue, Elk Grove Village

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of one (1) heatset lithographic printing press with a natural gas fired dryer controlled by a filter, one (1) non-heatset sheetfed lithographic press, two (2) folder gluers and 18 heating units pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/yr for volatile organic material (VOM), 10 tons per year of any single Hazardous Air Pollutant (HAP) and 25 tons per year of any combination of such HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
 - b. This permit contains the federally enforceable conditions from construction permit 97030157. These conditions effectively limit the potential emissions of VOM to 23.69 tons per year. As a result, this source does not constitute a new major source or major modification pursuant to 35 Ill. Adm. Code 203 Subpart B: Major Stationary Sources in Nonattainment Areas.
 - c. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - d. This permit supersedes all operating permit(s) for this location.
2. Pursuant to 35 Ill. Adm. Code 218.405(d)(2), the combined emissions of VOM from all lithographic printing line(s) at the source (including

solvents used for cleanup operations associated with the lithographic printing line(s)) shall never exceed 100 lbs/day, as determined in accordance with Section 218.411(a)(1)(B), before the application of capture systems and control devices.

3a. Operation and emissions from the lithographic printing press shall not exceed the following limits:

100 lbs VOM emission/day not to exceed 18.25 tons VOM emission/year

b. Compliance with the daily limit shall be determined by calculations which demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source never exceed 100 lbs/day before the use of capture systems and control devices, as follows:

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

ii. To determine the VOM content of the inks, fountain solution additives and cleaning solvents, the tests methods and procedures set forth in 35 Ill. Adm. Code Section 218.409(c) shall be used;

iii. To determine VOM emissions from inks used on lithographic printing line(s) at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing line(s); and

iv. To determine VOM emissions from fountain solutions and cleaning solvents used on lithographic printing line(s) at the source, no retention factor is used.

d. Emissions and operation of the two folder/glueers shall not exceed the following:

<u>Material</u> (Ton/Yr)	Maximum Usage		Maximum	VOM Emissions	
	(Lb/Mo)	(Ton/Yr)	VOM Content (% by Wt.)	(Lb/Mo)	
Adhesive	600	3.6	37	222	1.33

These limits are based on maximum material usage and maximum VOM content. Conversion factor used, 2,000 lb/ton.

- e. 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.
- f. Compliance with the annual limits immediately following the issuance date of this permit shall be determined using available data from the previous months.

- 4a. The Permittee shall maintain purchase and inventory records of the following:
- i. The name, identification, and VOM content of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;
 - ii. Inventory records from the beginning and end of each month indicating the total volume of each fountain solution additive, lithographic ink, and cleaning solvent to be used on any lithographic printing line at the source;
 - iii. Monthly purchase records for each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line at the source;
 - iv. A daily record which shows whether a lithographic printing line at the source was in operation on that day;
 - v. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month based on the monthly inventory and purchase records for the lithographic printing lines;
 - vi. The VOM emissions in lbs/day for the month for the lithographic printing lines;
 - vii. The name, identification and VOM content of adhesive, each ink, cleaner, and any other VOM containing material and HAP containing material used on or by the folder/glueers;
 - viii. Usage and emission of VOM containing material used on or by the folder/glueers; and
 - ix. Emissions of each HAP (lb/month and ton/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

5a. Total combined usage and emissions of any single HAP¹ from all emission units and activities shall not exceed the following limits:

<u>Single HAP¹ Usage (Tons/Yr)</u>	<u>Single HAP¹ Emissions (Tons/Yr)</u>
9.9	9.9

¹ Single HAP means any individual HAP listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., xylene, toluene).

These limits are based on a material balance and assume 100% of the HAPs used are emitted.

- b. Note that there is a "nested" limit on the emissions of the combination of HAPs as a result of the limit on VOM emissions. The HAPs emitted at this source have been determined to be VOMs and therefore limiting VOM emissions also limits HAP emissions.
 - c. The emissions of hazardous air pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAPs from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
6. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, a description of the exceedances or violation, and efforts to reduce emissions and future occurrences.

The following special conditions are not federally enforceable:

- 7. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
1340 North Ninth Street
P.O. Box 19276
Springfield, Illinois 62794-9276

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

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

- 8a. Emissions and operation of dryer and 18 heating units shall not exceed the following limits:

Maximum Natural Gas Usage (Therms/Month)	E M I S S I O N S			
	Nitrogen Oxides (Lb/Mo) (T/Yr)		Carbon Monoxide (Lb/Mo) (T/Yr)	
41,245	411.67	2.47	85.67	0.52

These limits are based on maximum natural gas usage, standard emission factors (for natural gas firing 100 lb NO_x/mmcf and 21 lb CO/mmcf), maximum firing rate of any individual unit not exceeding 10 mmBtu/hr heat input. Conversion factors used 2,000 lb/ton and 1 therm/100,000 Btu. Please note, mm = million. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. The Permittee shall maintain records of the following:
- i. Natural gas usage (therms/month and therms/year).
- c. Natural gas shall be the only fuel(s) fired in the dryer and 18 heating units.
9. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
- a. Natural gas usage (therms/yr).
 - b. VOM emissions, usage and VOM contents (ton/year).
 - c. HAPs emissions, usage and HAP contents (tons/year).
- If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.
10. The following Standard Conditions are not federally enforceable: Standard Conditions 3(a), 8, 9, 10 and 11.
11. In the event that the operation of this source results in an odor nuisance the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

Please note, that this permit has been revised to show the removal of 2 non-heatset sheetfed lithographic presses, 2 flexographic presses, two

folder gluers and 5 heating units.

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

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

DES:RBS:jar

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
USEPA

Attachment A

This attachment provides a summary of the maximum emission from the lithographic printing press operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used a daily emission limitation which limits the maximum emissions from this facility. This is a maximum VOM emission rate of 100 lbs/day and 18.25 tons per year for the lithographic printing press and a maximum annual emission of 1.3 tons of VOM from the two folder gluers. The resulting maximum emissions are below the threshold levels (i.e., 25 tons/yr for volatile organic material (VOM)) at which this source would be considered a major source for purposes of the Clean Air Act Program Permit (CAAPP). Actual emissions from this source will be less than predicted in this summary to the extent that VOM emissions at this facility are less than that required in this permit.

1. Emissions from the lithographic printing presses are as follows:

100 lbs VOM emission/day not to exceed 18.25 tons VOM emission/year

2. Emissions of the two folder/gluers are as follows:

<u>Material</u> (Ton/Yr)	<u>Maximum Usage</u> (Lb/Mo) (Ton/Yr)	<u>Maximum</u> <u>VOM Content</u> (% by Wt.)	<u>VOM Emissions</u> (Lb/Mo)	
Adhesive	600 3.6	37	222	1.33

These limits are based on maximum material usage and maximum VOM content. Conversion factor used, 2,000 lb/ton.

3. As a consequence of the requirements of this permit, the emissions of hazardous air pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from this source will be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs so that HAP emissions do not trigger the requirements to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

4. Emissions of the dryer and 18 heating units are as follows:

<u>Maximum Natural</u> <u>Gas Usage</u> (Therms/Month)	<u>E M I S S I O N S</u>			
	<u>Nitrogen Oxides</u> (Lb/Mo) (T/Yr)		<u>Carbon Monoxide</u> (Lb/Mo) (T/Yr)	
41,245	411.67 2.47		85.67 0.52	

Emissions are based on maximum natural gas usage, standard emission factors (for natural gas firing 100 lb NO_x/mmcf and 21 lb CO/mmcf), maximum firing rate of any individual unit not exceeding 10 mmBtu/hr

heat input. Conversion factors used 2,000 lb/ton and 1 therm/100,000 Btu. Please note, mm = million. Compliance with annual limits shall be determined from a running total of 12 months of data.

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