

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Weber Marking Systems, Inc.  
Attn: John O'Leary  
711 West Algonquin Road  
Arlington Heights, Illinois 60005-4457

<u>Application No.:</u> 04070058	<u>I.D. No.:</u> 031009AAS
<u>Applicant's Designation:</u>	<u>Date Received:</u> October 5, 2009
<u>Subject:</u> Label Manufacturing and Printing Plant	
<u>Date Issued:</u> February 16, 2011	<u>Expiration Date:</u> February 16, 2016
<u>Location:</u> 711 West Algonquin Road, Arlington Heights, Cook County, 60005	

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of thirty-five (35) flexographic printing presses, two (2) digital offset printing press, two (2) cold degreasers, one (1) glue applicator, five (5) ink mixing tanks, photo developing equipment with recovery still, six (6) laser etching machines and natural gas fired heating equipment as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
- i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for 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.
  - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ.
  - iii. To establish federally enforceable Emission Reduction Market System (ERMS) provisions, including baseline emissions, allotment for each seasonal allotment period, identification of any units deemed to be insignificant activities for the purposes of the ERMS, emissions calculation methodologies, and provisions addressing all other applicable requirements of 35 Ill. Adm. Code Part 205, which are described in Attachment B.

- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
  - c. This permit supersedes all operating permit(s) for this location.
- 2a. The paper coating lines are subject to the New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subparts A and RR. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 60.440(b), any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of 40 CFR 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR 60 Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to 40 CFR 60.442(a) and all other sections of 40 CFR 60 Subpart RR.
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
  - c. Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith at a point beyond the property line of the source.
  - d. Pursuant to 35 Ill. Adm. Code 212.321(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 Ill. Adm. Code 212.321(c).

4. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- 5a. Pursuant to 35 Ill. Adm. Code 218.182(c) (3) (B), on and after May 30, 2007, no person shall operate a cold cleaning degreaser with a solvent vapor pressure which exceeds 1.0 mmHg (0.019 psi) measured at 20°C (68°F), unless the person is in compliance with the control requirements of 35 Ill. Adm. Code 218.182(c) (4) or is exempt under 35 Ill. Adm. Code 218.182(f) or (g).
- b. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of this 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.
- c. Pursuant to 35 Ill. Adm. Code 218.401(a) (2), on and after August 1, 2010 no owner or operator of a subject flexographic or rotogravure printing line shall apply at any time any coating or ink unless the VOM content does not exceed the limitation specified in either 35 Ill. Adm. Code 218.401(a) (1) or (a) (2), as applicable. Compliance with 35 Ill. Adm. Code 218.401 must be demonstrated through the applicable coating or ink analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.404(c). As an alternative to compliance with 35 Ill. Adm. Code 218.401(a), a subject printing line may meet the requirements of 35 Ill. Adm. Code 218.401(b) or (c).
  - i. For owners operators of flexographic or rotogravure printing lines that do not print flexible packaging, either:
    - A. Forty percent VOM by volume of the coating and ink (minus water and any compounds that are specifically exempted from the definition of VOM); or
    - B. Twenty-five percent VOM by volume of the volatile content in the coating and ink;
  - ii. For owners or operators of flexographic or rotogravure printing lines that print flexible packaging, or that print flexible packaging and non-flexible packaging on the same line, either:
    - A. 0.8 kg VOM/kg (0.8 lbs VOM/lb) solids applied; or
    - B. 0.16 kg VOM/kg (0.16 lbs VOM/lb) inks and coatings applied.
- d. Pursuant to 35 Ill. Adm. Code 218.401(b) (2), on and after August 1, 2010 no owner or operator of a subject flexographic or rotogravure printing line that does not print flexible packaging shall apply

coatings or inks on the subject printing line unless the weighted average, by weight, VOM content of all coatings and inks as applied each day on the subject printing line does not exceed the limitation specified in either 35 Ill. Adm. Code 218.401(a)(2)(A)(i) (calculated in accordance with the equation in 35 Ill. Adm. Code 218.401(b)(1)(A)) or (a)(2)(A)(ii) (calculated in accordance with the equation in 35 Ill. Adm. Code 218.401(b)(1)(B)). Compliance with 35 Ill. Adm. Code 218.401(b)(2) shall be demonstrated through the applicable coating or ink analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.404(d).

- e. Pursuant to 35 Ill. Adm. Code 218.401(b)(3), on and after August 1, 2010, no owner or operator of a subject flexographic or rotogravure printing line that prints flexible packaging or that prints flexible packaging and non-flexible packaging on the same line, shall apply coatings or inks on the subject printing line unless the weighted average, by weight, VOM content of all coatings and inks as applied each day on the subject printing line does not exceed the limitation specified in either 35 Ill. Adm. Code 218.401(a)(2)(B)(i) (calculated in accordance with the equation in 35 Ill. Adm. Code 218.401(b)(3)(A)) or 35 Ill. Adm. Code 218.401(a)(2)(B)(ii) (calculated in accordance with the equation in 35 Ill. Adm. Code 218.401(b)(3)(B)). Compliance with 35 Ill. Adm. Code 218.401(b)(3) shall be demonstrated through the applicable coating or ink analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.404(d).
- f. Pursuant to 35 Ill. Adm. Code 218.402(b), the limitations of 35 Ill. Adm. Code 218.401(d) shall apply to all owners or operators of flexographic or rotogravure printing lines that print flexible packaging, or that print flexible packaging and non-flexible packaging on the same line, at a source where the combined emissions of VOM from all flexographic and rotogravure printing lines total 6.8 kg/day (15 lbs/day) or more (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines), in the absence of air pollution control equipment.
- g. Pursuant to 35 Ill. Adm. Code 218.405(c)(2), on and after August 1, 2010 the requirements in 35 Ill. Adm. Code 218.407(a)(1)(A) and (a)(2) through (a)(5) and all applicable provisions in 35 Ill. Adm. Code 218.409 through 218.411 shall apply to all owners or operators of lithographic printing lines if the combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) ever equal or exceed 6.8 kg/day (15 lbs/day), calculated in accordance with 35 Ill. Adm. Code 218.411(b)(1)(B), before the application of capture systems and control devices.
- h. Pursuant to 35 Ill. Adm. Code 218.407(a), no owner or operator of lithographic printing lines subject to the requirements of 35 Ill. Adm. Code 218 Subpart H shall:

- i. cause or allow the use of a cleaning solution on any lithographic printing line unless:
    - A. The VOM content of the as-used cleaning solution is less than or equal to:
      - i. 30 percent, by weight; or
      - ii. On and after August 1, 2010, for owners or operators of sources that meet the applicability criteria in 35 Ill. Adm. Code 218.405(c) (3) and do not certify pursuant to 35 Ill. Adm. Code 218.411(g) (1) (B) that the source will not make use of any of the exclusions in 35 Ill. Adm. Code 218.405(c) (3), 70 percent, by weight; or
    - B. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F);
  - ii. Cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored or disposed of in any manner other than in closed containers, except when specifically in use.
- 6a. This permit is issued based upon the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK. The flexographic printing presses at this source are not wide-web flexographic printing presses, as defined in 40 CFR 63.822(a).
- b. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ. Pursuant to 40 CFR 63.3290, the provisions of 40 CFR 63 Subpart JJJJ apply to each new and existing facility that is a major source of HAP, as defined in 40 CFR 63.2, at which web coating lines are operated.
7. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- 8a. This permit is issued based on the source not being subject to 35 Ill. Adm. Code 218.187 (Other Industrial Solvent Cleaning Operations).

Pursuant to 35 Ill. Adm. Code 218.187(a) (2), notwithstanding 35 Ill. Adm. Code 218.187(a) (1):

- i. The following cleaning operations shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (f), and (g):
  - A. Cleaning operations subject to the limitations in 35 Ill. Adm. Code 218.182, 218.183, or 218.184;
  - B. Stripping of cured coatings, inks, or adhesives, including screen reclamation activities;
  - C. Cleaning operations in printing pre-press areas, including the cleaning of film processors, color scanners, plate processors, film cleaning, and plate cleaning;
- ii. Cleaning operations for emission units within the following source categories shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (f), and (g):
  - A. Flexible package printing;
  - B. Lithographic printing;
- iii. The following cleaning operations shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (f), and (g):
  - A. Cleaning of metering rollers, dampening rollers, and printing plates; and
  - B. Cleaning operations associated with digital printing.
- b. Pursuant to 35 Ill. Adm. Code 218.204(c) (3), the paper coating limitation set forth in 35 Ill. Adm. Code 218.204(c) shall not apply to any owner or operator of any paper coating line on which flexographic rotogravure, lithographic, or letterpress printing is performed if the paper coating line complies with the applicable emissions limitations in 35 Ill. Adm. Code 218 Subpart H. In addition, screen printing on paper is not regulated as paper coating, but is regulated under 35 Ill. Adm. Code 218 Subpart TT. On and after May 1, 2011, the paper coating limitation shall also not apply to coating performed on or in-line with any digital printing press, or to size presses and on-machine coaters on papermaking machines applying sizing or water-based clays.
- c. Pursuant to 35 Ill. Adm. Code 218.402(c), upon achieving compliance with 35 Ill. Adm. Code 218 Subpart H, the flexographic and rotogravure printing lines are not required to meet 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302). Flexographic and rotogravure printing lines exempt from 35 Ill. Adm. Code 218 Subpart H are subject to 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302). Rotogravure or flexographic equipment used for both roll

printing and paper coating is subject to 35 Ill. Adm. Code 218 Subpart H.

- d. Pursuant to 35 Ill. Adm. Code 218.405(c) (3), notwithstanding 35 Ill. Adm. Code 218.405(c) (2), at sources where the combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing line(s)) equal or exceed 6.8 kg/day (15 lbs/day) but do not exceed 45.5 kg/day (100 lbs/day), calculated in accordance with 35 Ill. Adm. Code 218.411(a) (1) (B), before the application of capture systems and control devices, the following exclusions shall apply unless the owner or operator of the source certifies pursuant to 35 Ill. Adm. Code 218.411(g) (1) (B) that the source will not make use of any such exclusions:
  - i. The requirements of 35 Ill. Adm. Code 218.407(a) (3) shall not apply to sheet-fed offset lithographic printing lines with maximum sheet size of 11 x 17 inches or smaller;
  - ii. The requirements of 35 Ill. Adm. Code 218.407(a) (4) shall not apply to up to a total of 416.3 liters (110 gallons) per year of cleaning materials used on all lithographic printing lines at the source;
  - iii. The requirements of 35 Ill. Adm. Code 218.407(a) (4) (A) (i) shall not apply to lithographic printing lines at the source. Instead, the requirements of 35 Ill. Adm. Code 218.407(a) (4) (A) (ii) shall apply to such lines.
- e. This permit is issued based on the ink mixing tanks not being subject to 35 Ill. Adm. Code 218 Subpart AA (Paint and Ink Manufacturing). Pursuant to 35 Ill. Adm. Code 218.620(b), 35 Ill. Adm. Code 218 Subpart AA shall also apply to all paint and ink manufacturing sources which:
  - i. Have the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate, from process emission units that are not regulated by 35 Ill. Adm. Code 218 Subparts B, E, F, H, Q, R, S, T (excluding 35 Ill. Adm. Code 218.486), V, X, Y, Z, or BB, or
  - ii. Produce more than 1,892,705 l (500,000 gal) per calendar year of paint or ink formulations which contain less than 10% (by weight) water, and ink formulations not containing as the primary solvents water, Magie oil or glycol.
- f. This permit is issued based on the photo developing equipment with recovery still not being subject to 35 Ill. Adm. Code 218 Subpart TT (Other Emission Units). Pursuant to 35 Ill. Adm. Code 218.980(b) (1) (A), a source is subject to 35 Ill. Adm. Code 218 Subpart TT if it has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate, from emission units, other than furnaces at glass container manufacturing sources and VOM leaks from components, that are

not regulated by 35 Ill. Adm. Code 218 Subparts B, E, F, H, Q, R, S, T, (excluding 35 Ill. Adm. Code 218.486), V, X, Y, Z, or BB.

9. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 10a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
  - i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection

equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;

- vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- 11a. Pursuant to 35 Ill. Adm. Code 218.182(a), no person shall operate a cold cleaning degreaser unless:
- i. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
  - ii. The cover of the degreaser is closed when parts are not being handled; and
  - iii. Parts are drained until dripping ceases.
- b. Pursuant to 35 Ill. Adm. Code 218.182(b), no person shall operate a cold cleaning degreaser unless:
- i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counter-weights or a powered system if:
    - A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38°C (100°F);
    - B. The solvent is agitated; or
    - C. The solvent is heated above ambient room temperature.
  - ii. The degreaser is equipped with a device for draining cleaned parts. The drainage device shall be constructed so that parts are enclosed under the cover while draining unless:
    - A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F); or

- B. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external.
- iii. The degreaser is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F) or if the solvent is heated above 50°C (120°F) or its boiling point:
  - A. A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or
  - B. Any other equipment or system of equivalent emission control as approved by the Illinois EPA and further processed consistent with 35 Ill. Adm. Code 218.108. Such a system may include a water cover, refrigerated chiller or carbon adsorber.
- iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
- v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.
- b. Pursuant to 35 Ill. Adm. Code 218.401(d), no owner or operator of subject flexographic or rotogravure printing lines that print flexible packaging or print flexible packaging and non-flexible packaging on the same line shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with the subject flexographic or rotogravure printing lines to be kept, stored, or disposed of in any manner other than in closed containers, or conveyed from one location to another in any manner other than in closed containers or pipes, except when specifically in use.
- c. Pursuant to 35 Ill. Adm. Code 218.403(e), no owner or operator of a flexographic or rotogravure printing line complying by means of 35 Ill. Adm. Code 218.401(a)(2), (b)(2), or (b)(3) or complying by means of 35 Ill. Adm. Code 218.401(c)(2), (c)(3), or (c)(4), shall operate the printing line on or after August 1, 2010, unless the owner or operator has complied with, and continues to comply with, 35 Ill. Adm. Code 218.401(a)(2), (b)(2) or (b)(3), and 35 Ill. Adm. Code 218.401(c), as applicable, and all applicable provisions in 35 Ill. Adm. Code 218.404.
- d. Pursuant to 35 Ill. Adm. Code 218.403(f), no owner or operator of a flexographic or rotogravure printing line that prints flexible packaging, or that prints flexible packaging and non-flexible packaging on the same line, shall operate the printing line on or after August 1, 2010, unless the owner or operator has complied with, and continues to comply with, 35 Ill. Adm. Code 218.401(d) and 35 Ill. Adm. Code 218.404(g).

- e. Pursuant to 35 Ill. Adm. Code 218.403(g), no owner or operator of a flexographic or rotogravure printing line that prints flexible packaging, or that prints flexible packaging and non-flexible packaging on the same line, and that is exempt from the limitations of 35 Ill. Adm. Code 218.401(d) because of the criteria in 35 Ill. Adm. Code 218.402(b) shall operate the printing line on or after August 1, 2010, unless the owner or operator has complied with, and continues to comply with, 35 Ill. Adm. Code 218.402(b) and 35 Ill. Adm. Code 218.404(f).
- 12a. 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.
  - b. This permit is issued based on the digital offset printing presses utilizing inks and solvents which contain no materials that are Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act.
  - c. This permit is issued based on the digital offset printing presses at this source utilizing no fountain solution.
- 13a. Emissions and operation of the flexographic presses shall not exceed the following limits:
  - i. The VOM usage and VOM emissions from the thirty-two (32) flexographic printing presses constructed prior to 2007 shall not exceed the following limits 2.5 tons/month and 22.0 tons/year.
  - ii. Emissions and operation of the three flexographic printing presses (constructed in 2007 or later) shall not exceed the following limits:

<u>Emission Unit</u>	<u>VOM Usage and Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Mark Andy Press Group (3 Presses)	0.3	3.0

- A. These limits are based on the maximum production rate and the VOM content of raw materials. 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.
- B. The above limitations were established in Permit 07090016, pursuant to 35 Ill. Adm. Code 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 Clean Air Act, specifically 35 Ill. Adm. Code Part 203.

- iii. VOM and HAP emissions from the flexographic presses shall be calculated using the following equation:

$$E = \Sigma M_i \times V_i - W \times C_w$$

where:

E = VOM/HAP emissions (tons);

M<sub>i</sub> = VOM/HAP-containing raw materials usage (tons);

V<sub>i</sub> = VOM/HAP content of raw materials (wt. fraction);

W = Certified amount of waste shipped-off (tons/month, tons/year); and

C<sub>w</sub> = Certified VOM and HAP content of the waste (wt. fraction).

- b. Emissions and operation of the digital offset printing presses shall not exceed the following limits:

VOM Usage		VOM Emissions	
(Tons/Month)	(Tons/Year)	(Tons/Month)	(Tons/Year)
1.50	12.00	1.50	12.00

- i. These limits are based on the maximum production rate and the VOM content of raw materials. The VOM emissions shall be determined from the following equation:

$$E = \Sigma (M_j \times C_j) - W \times C_w$$

where:

E = VOM/HAP emissions (tons);

M<sub>j</sub> = VOM/HAP-containing raw materials usage (tons); and

C<sub>j</sub> = VOM and HAP content of raw materials (% by weight):

W = Certified amount of waste shipped-off (tons/month, tons/year); and

C<sub>w</sub> = Certified VOM and HAP content of the waste (wt. fraction).

- ii. The above limitations were established in Permits 08080045 and 10090012, pursuant to 35 Ill. Adm. Code 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 Clean Air Act, specifically 35 Ill. Adm. Code Part 203.

- d. The usage of VOM materials and VOM emissions from two cold degreasers operations shall not exceed 0.1 ton/month and 1.0 ton/year.
- e. Emissions and operation of the natural gas-fired equipment shall not exceed the following limits:
  - i. Natural Gas Usage: 7.50 mmscf/month, 60 mmscf/year
  - ii. Emissions from the combustions of natural gas:

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
	<u>(Lbs/mmscf)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Carbon Monoxide (CO)	84.0	0.32	2.52
Nitrogen Oxides (NO <sub>x</sub> )	100.0	0.38	3.00
Particulate Matter (PM)	7.6	0.03	0.23
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.01	0.02
Volatile Organic Material (VOM)	5.5	0.02	0.20

These limits are based on the maximum operating rate and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July, 1998).

- f. This permit is issued based on negligible emissions of volatile organic materials from the glue applicator, ink mixing tanks and photo developing equipment. For this purpose, emissions from each emission unit or group of emission units shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
  - g. This permit is issued based on negligible emissions of particulate matter from the six laser etching machines. For this purpose emissions shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 tons/year.
  - h. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA and the NESHAP for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ.
  - i. Compliance with the annual limits of this permit 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 of total).
14. Pursuant to 40 CFR 60.466(a), the VOC content per unit of coating solids applied and compliance with 40 CFR 60.422(a)(1) shall be determined by either Method 24 and the equations specified in 40 CFR 60.443 or by manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and manufacturers' formulation data, the Method 24 test will govern. The Illinois EPA or USEPA may

require an owner or operator to perform Method 24 tests during such months as he deems appropriate. For Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.

- 15a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
    - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
    - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
  - b. Testing required by Conditions 16 and 17 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
16. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
  - 17a. Pursuant to 35 Ill. Adm. Code 218.404(a), the VOM content of each coating and ink and the efficiency of each capture system and control

device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.404.

- b. Pursuant to 35 Ill. Adm. Code 218.409(a), testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218.407 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA, or as otherwise specified in 35 Ill. Adm. Code 218 Subpart H. 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.
  - c. Pursuant to 35 Ill. Adm. Code 218.409(c), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.407(a) (1) (A), (a) (2), (a) (3) and (a) (4) (A), and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of 35 Ill. Adm. Code 218.411(a) (1) (B), (b) (1) (B), or (b) (2) (B), as applicable, shall be conducted upon request of the Illinois EPA or as otherwise specified in 35 Ill. Adm. Code 218 Subpart H, as follows:
    - i. The applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) shall be used; provided, however, Method 24 shall be used to demonstrate compliance; 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 Ill. Adm. Code 218.105(a); provided, however, Method 24 shall be used to determine compliance.
  - d. Pursuant to 35 Ill. Adm. Code 218.409(e), 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 Ill. Adm. 218.110.
- 18a. Pursuant to 35 Ill. Adm. Code 218.410(e) (1), the owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with 35 Ill. Adm. Code 218.407(a) (4) (A) must:
- i. For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):
    - A. 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;  
and

- B. 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 35 Ill. Adm. Code 218.407(a)(4)(A).
  - ii. 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 35 Ill. Adm. Code 218.411(f)(2).
  - b. Pursuant to 35 Ill. Adm. Code 218.410(e)(2), the owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with 35 Ill. Adm. Code 218.407(a)(4)(B) must keep records for such cleaning solutions used on any such lines as set forth in 35 Ill. Adm. Code 218.411(f)(2)(C).
- 19a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.
- 20a. Pursuant to 40 CFR 60.445(a), the owner or operator of an affected facility subject to 40 CFR 60 Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in 40 CFR 60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.
- b. Pursuant to 40 CFR 60.445(d), the owner or operator of an affected facility operating at the conditions specified in 40 CFR 60.440(b) shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.
  - c. Pursuant to 40 CFR 60.445(h), records of the measurements required in 40 CFR 60.443 and 60.445 must be retained for at least two years following the date of the measurements.

21. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
22. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 23a. Pursuant to 35 Ill. Adm. Code 218.182(d)(2), all persons subject to the requirements of 35 Ill. Adm. Code 218.182(c)(1)(B), (c)(2)(B), and (c)(3)(B) must maintain records which include for each purchase:
  - i. The name and address of the solvent supplier;
  - ii. The date of purchase;
  - iii. The type of solvent; and
  - iv. The vapor pressure of the solvent measured in mmHg at 20°C (68°F); and
- b. Pursuant to 35 Ill. Adm. Code 218.182(e), all records required by 35 Ill. Adm. Code 218.182(d) shall be retained for three years and shall be made available to the Illinois EPA upon request.

- c. Pursuant to 35 Ill. Adm. Code 218.404(c) (2), on and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, or on and after the initial start-up date, the owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(a) shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating and ink as applied on each printing line.
  - ii. The VOM content of each coating and ink as applied each day on each printing line.
- d. Pursuant to 35 Ill. Adm. Code 218.404(d) (2), on and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, or on and after the initial start-up date, the owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(b) shall collect and record all of the following information each day for each printing line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating and ink as applied on each printing line.
  - ii. The VOM content and the volume, or weight of solids, as applicable, of each coating and ink as applied each day on each printing line.
  - iii. The daily-weighted average VOM content of all coatings and inks as applied on each printing line.
- e. Pursuant to 35 Ill. Adm. Code 218.404(h), all records required by 35 Ill. Adm. Code 218.404(f) and (g) shall be retained for at least three years and shall be made available to the Illinois EPA upon request.
- f. Pursuant to 35 Ill. Adm. Code 218.411(f) (2), for lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the limitations of 35 Ill. Adm. Code 218.407 shall collect and record the following information for each cleaning solution used on each lithographic printing line:
  - i. For each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 Ill. Adm. Code 218.407(a) (4) (A) and which is prepared at the source with automatic equipment:
    - A. The name and identification of each cleaning solution;

- B. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(c);
  - 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);
  - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
  - E. The VOM content of the as-used cleaning solution, supporting calculations; and
  - F. A calibration log for the automatic equipment, detailing periodic checks;
- ii. For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 Ill. Adm. Code 218.407(a) (4) (A) and that is not prepared at the source with automatic equipment:
- A. The name and identification of each cleaning solution;
  - B. Date and time of preparation, and each subsequent modification, of the batch;
  - C. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(c);
  - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
  - E. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM content 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 Ill. Adm. Code 218.105(a);
- 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 35 Ill. Adm. Code 218.407(a) (4) (B):
- A. The name and identification of each cleaning solution;

- B. Date and time of preparation, and each subsequent modification, of the batch;
  - C. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with 35 Ill. Adm. Code 218.409(e). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a) and 218.110;
  - D. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
  - E. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(e). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a) and 218.110;
- 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;
- g. Pursuant to 35 Ill. Adm. Code 218.411(g) (2) (A), the owner or operator of lithographic printing lines subject to one or more of the exclusions set forth in 35 Ill. Adm. Code 218.405(c) (3) shall, unless the source has certified in accordance with 35 Ill. Adm. Code 218.411(g) (1) (B) that it will not make use of any of the exclusions set forth in 35 Ill. Adm. Code 218.405(c) (3), collect and record the following information for all lithographic printing lines at the source:
- i. Calculations that 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 45.5 kg/day (100 lbs/day) before the use of capture systems and control devices, determined in accordance with the calculations in 35 Ill. Adm. Code 218.411(b) (2) (B);
  - ii. The amount of cleaning materials used on lithographic printing lines at the source that does not comply with the cleaning material limitations in 35 Ill. Adm. Code 218.407(a) (4);
- h. Pursuant to 35 Ill. Adm. Code 218.411(h), the owner or operator shall maintain all records required by 35 Ill. Adm. Code 218.411 at the

source for a minimum period of three years and shall make all records available to the Illinois EPA upon request.

- 24a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Monthly and annual usage of the inks, coatings, adhesives and clean-up solvents (tons/month and tons/year);
  - ii. The VOM content and the HAP content of the inks, coatings, adhesives and clean-up solvents used (wt. %);
  - iii. Density of the inks, coatings, adhesives and clean-up solvents (lbs/gallon);
  - iv. Natural gas usage (mmscf/month and mmscf/year); and
  - v. Monthly and annual CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAP emissions from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) 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 storage device) 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.
25. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 26a. Pursuant to 35 Ill. Adm. Code 218.182(d)(6), all persons subject to the requirements of 35 Ill. Adm. Code 218.182(b) or (c) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.182(b) or (c) by sending a description of the violation and copies of records documenting such violations to the Illinois EPA within 30 days following the occurrence of the violation.
- b. Pursuant to 35 Ill. Adm. Code 218.404(c), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(a) shall comply with the following:
- i. By a date consistent with 35 Ill. Adm. Code 218.106, or Section 218.403(e), as applicable, or upon initial start-up of a new

printing line, or upon changing the method of compliance from an existing subject printing line from 35 Ill. Adm. Code 218.401(b) or 35 Ill. Adm. Code 218.401(c) of this Part to Section 218.401(a), the owner or operator of a subject printing line shall certify to the Illinois EPA that the printing line will be in compliance with 35 Ill. Adm. Code 218.401(a) on and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, or on and after the initial start-up date. The owner or operator of a printing line subject to the requirements in 35 Ill. Adm. Code 218.401(a)(2)(B) shall certify in accordance with this 35 Ill. Adm. Code 218.404(c)(1) even if the owner or operator of such line submitted a certification prior to January 1, 2010. Such certification shall include:

- A. The name and identification number of each coating and ink as applied on each printing line.
  - B. The VOM content of each coating and ink as applied each day on each printing line.
- ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, the owner or operator of a subject printing line shall notify the Illinois EPA in the following instances:
- A. Any record showing violation of 35 Ill. Adm. Code 218.401(a) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
  - B. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(a) to 35 Ill. Adm. Code 218.401(b) or (c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(d)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(a) to 35 Ill. Adm. Code 218.401(b) or (c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(d) or (e), respectively.
- c. Pursuant to 35 Ill. Adm. Code 218.404(d)(3), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(b) shall comply with the following:
- i. By a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, or upon initial start-up of a new printing line, or upon changing the method of compliance for an existing subject printing line from 35 Ill. Adm. Code 218.401(a) or (c) to 35 Ill. Adm. Code 218.401(b), the owner or

operator of the subject printing line shall certify to the Illinois EPA that the printing line will be in compliance with 35 Ill. Adm. Code 218.401(b) on and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, or on and after the initial start-up date. The owner or operator of a printing line subject to the requirements in 35 Ill. Adm. Code 218.401(b) (3) shall certify in accordance with 35 Ill. Adm. Code 218.404(d) (1) even if the owner or operator of such line submitted a certification prior to January 1, 2010. Such certification shall include:

- A. The name and identification number of each printing line which will comply by means of 35 Ill. Adm. Code 218.401(b).
  - B. The name and identification number of each coating and ink available for use on each printing line.
  - C. The VOM content of each coating and ink as applied each day on each printing line.
  - D. The method by which the owner or operator will accurately calculate the volume, or weight of solids, as applicable, of each coating and ink as applied each day on each printing line.
  - E. The method by which the owner or operator will create and maintain records each day as required in 35 Ill. Adm. Code 218.404(d) (2).
  - F. An example of the format in which the records required in 35 Ill. Adm. Code 218.404(d) (2) will be kept.
- ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, the owner or operator of a subject printing line shall notify the Illinois EPA in the following instances:
- A. Any record showing violation of 35 Ill. Adm. Code 218.401(b) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
  - B. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(b) to 35 Ill. Adm. Code 218.401(a) or 218.401(c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(c) (1) or (e) (1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(b) to 35 Ill. Adm. Code 218.401(a) or (c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(c) or (e), respectively.

- d. Pursuant to 35 Ill. Adm. Code 218.404(g) (2), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401(d) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.401(d) by sending a description of the violation and copies of records documenting such violations to the Illinois EPA within 30 days following the occurrence of the violation.
- e. Pursuant to 35 Ill. Adm. Code 218.411(f) (2), for lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of 35 Ill. Adm. Code 218.407 shall notify the Illinois EPA in writing of any violation of 35 Ill. Adm. Code 218.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation.
- f. Pursuant to 35 Ill. Adm. Code 218.411(g), the owner or operator of lithographic printing lines subject to one or more of the exclusions set forth in 35 Ill. Adm. Code 218.405(c) (3) shall:
  - i. If changing from utilization of the exclusions set forth in 35 Ill. Adm. Code 218.405(c) (3) to opting out of such exclusions pursuant to 35 Ill. Adm. Code 218.411(g) (1) (B), or if there is a change at the source such that the exclusions no longer apply, certify compliance in accordance with 35 Ill. Adm. Code 218.411(g) (1) (B) within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing lines will be in compliance with the applicable requirements of 35 Ill. Adm. Code 218.407;
  - ii. If changing from opting out of the exclusions set forth in 35 Ill. Adm. Code 218.405(c) (3) pursuant to 35 Ill. Adm. Code 218.411(g) (1) (B) to utilization of such exclusions, certify compliance in accordance with 35 Ill. Adm. Code 218.411(g) (1) (A) within 30 days after making such change.
- g. Pursuant to 35 Ill. Adm. Code 218.637(a), upon request by the Illinois EPA, the owner or operator of an emission source which claims to be exempt from the requirements of 35 Ill. Adm. Code 218 Subpart AA shall submit records to the Illinois EPA within 30 calendar days from the date of the request which document that the emission source is in fact exempt from 35 Ill. Adm. Code 218 Subpart AA. These records shall include (but are not limited to) the percent water (by weight) in the paint or ink being produced and the quantity of Magie oil, glycol and other solvents in the ink being produced.
- h. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.

27a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or deviation and efforts to reduce emissions and future occurrences.

b. Two (2) copies of required reports and notifications shall be sent to:

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

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

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

It should be noted that this permit has been revised so as to include the operation of the equipment described in Construction Permit 10090012.

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

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

ECB:VJB:psj

cc: IEPA, FOS Region 1  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the label manufacturing and printing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, (e.g., 100 tons/year of VOM, 10 tons/year for a single HAP, and 25 tons/year for any combination of such HAP), at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is used and control measures are more effective than required in this permit.

<u>Emission Units</u>	E M I S S I O N S (Tons/Year)						<u>Total HAPs</u>
	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>	<u>Single HAP</u>	
32 Flexographic Presses					22.00		
Mark Andy Press Group (3 Presses)					3.00		
Digital offset press					12.00		
Two cold degreasers					1.00		
Glue applicator					0.44		
Five ink mixers					0.44		
Two photo developers					0.44		
Six laser Etchers			0.44				
Natural Gas Combustion	<u>2.52</u>	<u>3.00</u>	<u>0.23</u>	<u>0.02</u>	<u>0.20</u>	<u>-----</u>	<u>-----</u>
Total	2.52	3.00	0.67	0.02	39.52	9.0	22.5

VJB:psj

Attachment B -- EMISSION REDUCTION MARKET SYSTEM (ERMS)

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 Clean Air Act.

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' 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 Ill. Adm. Code 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 Ill. Adm. Code 205.500 and 35 Ill. Adm. Code 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 Ill. Adm. Code 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 Ill. Adm. Code 205.630).

2. Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 Ill. Adm. Code Part 205.

3. Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 Ill. Adm. Code 205.150(c)(1) and 35 Ill. Adm. Code 205.720, and as further addressed by Condition 8 of this Attachment, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 5 of this Attachment.
  - i. VOM emissions from emission units that the Illinois EPA determines would qualify as insignificant activities under 35 Ill. Adm. Code 201.Subpart F if the source were a CAAPP source and for which a statement to this effect is contained in the FESOP for a participating or new participating source are exempt from the requirements of 35 Ill. Adm. Code Part 205, in accordance with 35 Ill. Adm. Code 205.220(b);
  - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit for sources permitted to operate during startup, malfunction or breakdown pursuant to 35 Ill. Adm. Code 201.262, in accordance with 35 Ill. Adm. Code 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 Ill. Adm. Code 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 Ill. Adm. Code 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Condition 8(b) of this Attachment, if applicable, in accordance with 35 Ill. Adm. Code 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 Ill. Adm. Code 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 Ill. Adm. Code Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions of this permit.

4. Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 Ill. Adm. Code 205.610(a).

- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 Ill. Adm. Code 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 Ill. Adm. Code 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 Ill. Adm. Code 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

5. Emission Excursion Compensation

Pursuant to 35 Ill. Adm. Code 205.720, if the source fails to hold ATUs in accordance with Condition 3 of this Attachment, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
  - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
  - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 Ill. Adm. Code 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6. Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 Ill. Adm. Code 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 Ill. Adm. Code 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 Ill. Adm. Code 205.750(a), and shall be submitted in accordance with the following:
    - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
    - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.
7. Annual Account Reporting
- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 Ill. Adm. Code 205.300]:
    - i. Actual seasonal emissions of VOM from the source;
    - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
    - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 Ill. Adm. Code 205.337;
    - iv. If a source has experienced an emergency, as provided in 35 Ill. Adm. Code 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
    - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 Ill. Adm. Code 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 Ill. Adm. Code 205.320(e)(3); and
    - vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet

available, as specified in 35 Ill. Adm. Code 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

8. Allotment of ATUs to the Source

- a.
  - i. The allotment of ATUs to this source is 174 ATUs per seasonal allotment period.
  - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 19.67 tons per season.

This determination includes the use of 1993 and 1994 as baseline seasons. This determination includes use of the 1993 season as a substitute for the 1995 and 1996 seasons due to non-representative conditions in these seasons, as allowed by 35 Ill. Adm. Code 205.320(a)(2).

- iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 Ill. Adm. Code 205.405, including units complying with MACT or using BAT, as identified in Condition 10 of this Attachment of this permit.
  - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
  - v. Condition 3(a) of this Attachment becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

- b. Contingent Allotments for New or Modified Emission Units

Not applicable.

- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 Ill. Adm. Code Part 205, including:

- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 Ill. Adm. Code 205.630;

- ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 Ill. Adm. Code 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 Ill. Adm. Code 205.410.

9. Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 Ill. Adm. Code 205.700(a)]:

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as recorded and as required by Condition 24(a)(v) of this permit and Condition 6(a) of this Attachment; and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

10. Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 Ill. Adm. Code 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 Ill. Adm. Code 205.405(a)]:
  - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the Clean Air Act;
  - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
  - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 Ill. Adm. Code 205.405(a) and (c)]:

Fuel Combustion Emission Units

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 Ill. Adm. Code 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 Ill. Adm. Code 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 Ill. Adm. Code 205.405(b) and (c)]:

VJB:psj