

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
1021 N. Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

Project Summary for an Application from
Weber Marking Systems, Inc. for Revision of the
Federally Enforceable State Operating Permit (FESOP) for
711 West Algonquin Road,
Arlington Heights, Illinois

Site Identification No.: 031009AAS
Application No.: 04070058

Schedule

Public Comment Period Begins: January 6, 2011
Public Comment Period Closes: February 5, 2011

Illinois EPA Contacts

Permit Analyst: Valeriy Brodsky
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

Weber Marking Systems, Inc. currently operates under federally enforceable state operating permit (FESOP) which was issued five years ago. The company requested a renewal of their FESOP to continue to operate as non-major source for the purposes of the Clean Air Act Permit Program (CAAPP). This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before issuing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

II. SOURCE DESCRIPTION

Weber Marking Systems, Inc. is label printing plant. The emission units at this plant that require an operating permit include thirty-five flexographic printing presses, two cold degreasers, one glue applicator, five ink mixing tanks, photo developing equipment with recovery still, and natural gas fired heating equipment. The company also operates two digital printing presses which represent a subset of non-heatset offset printing presses. These presses create electronically charged image on the plate which attracts ink particles and it is transferred to the paper through the roller. These units are sources of emissions because the printing inks and cleaning solutions contain organic solvents, which are emitted to the atmosphere as volatile organic material (VOM). The solvents also contain components that are considered hazardous air pollutants (HAPs). The natural gas combustion generates the whole spectrum of pollutants predominantly represented by Nitrogen Oxides (NO_x) and Carbon Monoxide (CO).

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has been operating this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the Clean Air Act and regulations promulgated thereunder. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source for this program. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs tons.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The board has specific standards for units emitting volatile organic material in the Greater Chicago area, e.g., 35 IAC, Part 218, Subpart H – Printing and Publishing. The source is subject to the requirements of this subpart pursuant to provision of 35 Ill. Adm. Code 218.402(a).

The source potentially could be subject to the 40 CFR 63, Subpart KK— National Emission Standards for the Printing and Publishing Industry. The source is exempted from the requirements of this subpart due to FESOP limitations of the potential emissions of HAPs to below major source threshold level and the flexographic printing presses are not wide-web printing presses.

The label printing operations potentially could be subject to the New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR. The source is exempted from the requirements of this subpart pursuant to provisions of 40 CFR 60.440(b) for facilities consuming less than 50 tons per year of VOM.

Pursuant to 35 Ill. Adm. Code 218.402(b) the flexographic source's printing operations are exempt from complying with general VOM emission limitation found in 35 IAC 218.301 – Use of Organic Material.

The solvent degreasing operations are subject to operational, equipment and material requirements of 35 Ill. Adm. Code 218.182.

The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

The revised permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant. As explained, the printing presses are subject to 35 IAC 218.401 control requirements, which restricts VOM content of the inks and coatings applied at the printing presses or require certain degree of control to decrease VOM emissions. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit conditions would also continue to require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to renew the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.