

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Formel Industries, Inc.  
Attn: Jim Zidek  
2355 North 25th Avenue  
Franklin Park, Illinois 60131

<u>Application No.:</u> 05030054	<u>I.D. No.:</u> 031096AMM
<u>Applicant's Designation:</u>	<u>Date Received:</u> October 4, 2007
<u>Subject:</u> Flexographic and Rotogravure Packaging Printing Facility	
<u>Date Issued:</u> March 21, 2008	<u>Expiration Date:</u> August 23, 2010
<u>Location:</u> 2355 North 25th Avenue and 11323 West Franklin Avenue, Franklin Park, Cook County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of three flexographic printing presses controlled by catalytic afterburner and one rotogravure printing press controlled by catalytic afterburner 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:
  - 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 a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
  - ii. To establish federally enforceable production and operating limitations, which restrict a 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 being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK.
  - iii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.

- 2a. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 Ill. Adm. Code 212.301 and 212.314.
- c. 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.
- d. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 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.
- e. 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.
- f. 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 subsection (c) of 35 Ill. Adm. Code 212.321.
3. 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 unit to exceed 2000 ppm.
- 4a. Pursuant to 35 Ill. Adm. Code 218.401(a), no owner or operator of a subject flexographic, packaging rotogravure or publication 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). Compliance with this 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. Forty percent VOM by volume of the coating and ink (minus water and any compounds which are specifically exempted from the definition of VOM), or
  - ii. Twenty-five percent VOM by volume of the volatile content in the coating and ink.
- b. Pursuant to 35 Ill. Adm. Code 218.401(b), no owner or operator of a subject flexographic, packaging rotogravure or publication rotogravure printing line shall apply coatings or inks on the subject printing line unless the weighted average, by volume, 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)(1) (as determined by 35 Ill. Adm. Code 218.401(b)(1)) or 35 Ill. Adm. Code 218.401(a)(2) (as determined by 35 Ill. Adm. Code 218.401(b)(2)). Compliance with 35 Ill. Adm. Code 218.401(b) 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(d).

- c. Pursuant to 35 Ill. Adm. Code 218.401(c), no owner or operator of a subject flexographic, packaging rotogravure or publication rotogravure printing line equipped with a capture system and control device shall operate the subject printing line unless the owner or operator meets the requirements in 35 Ill. Adm. Code 218.401(c) (1), (c) (2), or (c) (3) and 35 Ill. Adm. Code 218.401(c) (4), (c) (5) and (c) (6).
  - i. An incineration system is used which reduces the captured VOM emissions by at least 90 percent by weight; and
  - ii. The printing line is equipped with a capture system and control device that provides an overall reduction in VOM emissions of at least:
    - A. 75 percent where a publication rotogravure printing line is employed, or
    - B. 65 percent where a packaging rotogravure printing line is employed, or
    - C. 60 percent where a flexographic printing line is employed, and
  - iii. The control device is equipped with the applicable monitoring equipment specified in 35 Ill. Adm. Code 218.105(d) (2) and except as provided in 35 Ill. Adm. Code 218.105(d) (3), the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times the control device is in use, and
  - iv. The capture system and control device are operated at all times when the subject printing line is in operation. The owner or operator shall demonstrate compliance with 35 Ill. Adm. Code 218.401(c) by using the applicable capture system and control device test methods and procedures specified in 35 Ill. Adm. Code 218.105(c) through 35 Ill. Adm. Code 218.105(f) and by complying with the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.404(e).
- 5. This permit is issued based on the rotogravure press not being subject to the New Source Performance Standards (NSPS) for Publication Rotogravure Printing, 40 CFR Part 60, Subpart QQ, because the affected press does not meet the definition of a publication rotogravure printer.
- 6a. Pursuant to 35 Ill. Adm. Code 218.204(c), the paper coating limitation shall not apply to any owner or operator of any paper coating line on which flexographic or rotogravure printing is performed if the paper coating line complies with the emissions limitations in 35 Ill. Adm. Code 218.401.

- b. Pursuant to 35 Ill. Adm. Code 218.402(b), 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.
- 7a. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the catalytic afterburner such that the catalytic afterburner is kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
- b. The afterburner's combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test. This temperature shall be maintained during operation.
- 8a. VOM emissions from printing presses operations shall not exceed 3.0 tons/month and 24.5 tons/year. The VOM and HAP emissions shall be determined from the following equation:

$$E = [\sum(M_i \times C_i) - W \times C_w] \times (1 - CE)]/2,000,$$

where:

E = VOM/HAP emissions (tons);

$M_i$  = VOM/HAP-containing raw material usage (gallons);

$C_i$  = VOM/HAP content of the raw material (lbs/gallon);

W = certified amount of waste shipped-off (gallon);

$C_w$  = certified VOM/HAP content of the waste (lbs/gallon);

CE = overall control efficiency of the capture system and control device demonstrated during the most recent stack test.

Value of  $C_w$  for the current reporting period shall be used from the most recent waste shipment. Upon receiving updated  $C_w$  for the reporting period emissions shall be recalculated. HAP emission and HAP content of the waste may be assumed proportional to the HAP fraction of total VOM used during the corresponding period.

- b. Operation and emissions of the natural gas combustion equipment shall not exceed the following limits:
  - i. Natural Gas Usage: 10 mmscf/month, 80 mmscf/year

ii. Emissions from the natural gas combustion:

<u>Pollutant</u>	<u>Emission Factor (lb/mmscf )</u>	<u>Emissions</u>	
		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Nitrogen Oxides (NO <sub>x</sub> )	100	0.5	4.0
Carbon Monoxide (CO)	84	0.4	3.4
Particulate Matter (PM)	7.6	0.04	0.3
Volatile Organic Materials (VOM)	5.5	0.03	0.2

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).

9. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 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 all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP) permit and the NESHAP for the Printing and Publishing Industry, 40 CFR 63 Subpart KK.
10. 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 total).
- 11a. 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 12 and 13 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 12a. Pursuant to 35 Ill. Adm. Code 212.107, for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This Condition shall not apply to 35 Ill. Adm. Code 212.301.
- b. Pursuant to 35 Ill. Adm. Code 212.109, except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.
  - c. Pursuant to 35 Ill. Adm. Code 212.110(a), measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E.
  - d. Pursuant to 35 Ill. Adm. Code 212.110(b), the volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4.
  - e. 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.
13. 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.

- 14a. Pursuant to 35 Ill. Adm. Code 218.105(d) (2) (A) (ii), an owner or operator that uses an afterburner or carbon adsorber to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the control device is in use except as provided in 35 Ill. Adm. Code 218.105(d) (3). The continuous monitoring equipment must monitor for each afterburner which has a catalyst bed, commonly known as a catalytic afterburner, the temperature rise across each catalytic afterburner bed or VOM concentration of exhaust.
- b. Pursuant to 35 Ill. Adm. Code 218.105(d) (2) (B), an owner or operator must install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of  $\pm 1$  percent of the temperature measured in degrees Celsius or  $\pm 0.5^\circ$  C, whichever is greater.
15. 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.

16. 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.
  
- 17a. Pursuant to 35 Ill. Adm. Code 218.404(c)(2), 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 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.
  
- b. Pursuant to 35 Ill. Adm. Code 218.404(d)(2), 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 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 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.
  
- c. Pursuant to 35 Ill. Adm. Code 218.404(e)(2), 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(c) shall collect and record all of the following information each day for each printing line and maintain the information at the facility for a period of three years:
  - i. Control device monitoring data.
  - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated printing line.
  - iii. A maintenance log for the capture system, afterburner, and monitoring device detailing all routine and non-routine maintenance performed including dates and duration of any outages.

- 18a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Amount of each VOM/HAP containing material used in the printing and clean-up operations (gallons/month, gallons/year);
  - ii. VOM and HAP content of each VOM/HAP containing material used in printing and clean-up operations (weight percent);
  - iii. Certified amount of waste shipped-off (gallons/month, gallons/year) and its VOM content (lbs/gallon);
  - iv. Natural gas usage (mmscf/month, mmscf/year); and
  - v. Monthly and annual emission of CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAPs 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) 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.
19. If there is an exceedance of or 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/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 exceedance or deviation and efforts to reduce emissions and future occurrences.
20. 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.
- 21a. Pursuant to 35 Ill. Adm. Code 218.404(c)(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(a) shall notify the Illinois EPA in the following instances:
- i. 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.

- ii. 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.
- b. 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 notify the Illinois EPA in the following instances:
- i. 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.
  - ii. 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.
- c. Pursuant to 35 Ill. Adm. Code 218.404(e) (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 notify the Illinois EPA in the following instances:
- i. Any record showing violation of 35 Ill. Adm. Code 218.401(c), shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
  - ii. 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(c) to 35 Ill. Adm. Code 218.401(a) or (b), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(c) (1) or (d) (1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(c) to 35 Ill. Adm. Code 218.401(a) or (b), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(c) or (d), respectively.

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

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
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  
9511 West Harrison  
Des Plaines, Illinois 60016

It should be noted that this permit has been revised to include operation of one rotogravure printing press described in the Construction Permit 04060036.

It should also be noted that this permit has been revised so as to increase the permitted source-wide limit for VOM emissions from 16.5 tons/year to 24.5 tons/year.

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

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

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

ECB:VJB:jws

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the packaging printing facility 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 for volatile organic material (VOM), 10 tons per year for a single HAP, and 25 tons per year for totaled HAP) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

<u>Process</u>	Emissions (tons/year)					
	VOM	NO <sub>x</sub>	CO	PM	Single HAP	Total HAP
Printing Operations	24.5					
Natural Gas Combustion	<u>0.2</u>	<u>4.0</u>	<u>3.4</u>	<u>0.3</u>		
Total	24.7	4.0	3.4	0.3	9.0	22.5

VJB:jws