

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Lehigh Direct for a
Federally Enforceable State Operating Permit (FESOP) for
1900 South 25th Avenue
Broadview, Illinois 60153-4597

Site Identification No.: 031817AAD
Application No.: 06030006

Illinois EPA Contacts

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I. INTRODUCTION

Lehigh Direct has applied for a Federally Enforceable State Operating Permit (FESOP) for its printing plant. 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 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

Lehigh Direct is involved in a printing operation using heatset web offset lithographic printing presses. Heatset web offset lithographic printing involves the use of dryers to dry the ink applied through the printing units. VOM emissions associated with the printing operation are controlled by afterburners.

There are eight (8) printing presses. Presses #34, #37, #39, #40, #41, #45, #46 and #48 are connected to two thermal oxidizers.

The presses use the heatset web offset lithographic process to transfer inked images from the plate to the impression roller and then to the paper with the aid of fountain solution. The printed-paper passes through the dryer where 80% of the ink is flashed off by the heat. The VOM emissions are vented to the afterburners where 90% of the emissions are destructed. Part of the emissions from fountain solution, cleaning and washing solvents are fugitive emissions and vented to the atmosphere. Each printing unit is equipped with a set of inking rollers, impression rollers with blanket, ink and fountain solution reservoir.

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 federal Clean Air Act. 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. 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.

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 Illinois Pollution Control Board has specific standards for units emitting volatile organic material in the greater Chicago area. These standards require that afterburners be installed and operated that 5reduce volatile organic material emissions from the press dryers by 90 percent, 35 Ill. Adm. Code 218.407. These standards also require low VOM contents for the fountain solution and cleaning solution used.

V. CONTENTS OF THE Permit

The permit that the Illinois EPA is proposing to issue identifies the specific emission standards that apply to the emission units at the plant. 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 would also set limitations on the monthly and annual natural gas usage. The combustion of natural gas emits air pollutants such as nitrogen oxides, carbon monoxide and volatile organic material. The limits on natural gas usage will restrict emissions to the atmosphere. These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions 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 issuance of its permit. The Illinois EPA is therefore proposing to issue 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.

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