

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Perfect Plastic Printing Corp.
Attn: Carl Valenti
345 Kautz Road
St. Charles, Illinois 60174

Application No.: 02070017

I.D. No.: 089483ACM

Applicant's Designation:

Date Received: July 5, 2002

Subject: Screen and Lithographic Printing

Date Issued:

Expiration Date:

Location: 345 Kautz Road, St. Charles

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of five non-heatset offset sheet-fed lithographic printing presses and three screen printing presses pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/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 requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits for this location.
2. This permit is issued based upon the lithographic printing operations being exempt from the control requirements of 35 Ill. Adm. Code Part 218, Subpart H: Printing and Publishing, Section 218.407: Emission and Control Requirements for Lithographic Printing Lines On and After March 15, 1996. This is consequence of the combined daily emission rate of volatile organic materials (VOM) from all subject presses at the facility (including solvents used for cleanup operations associated with the lithographic printing lines) never exceeded an applicability threshold of 100 lb/day established by Section 218.405(d)(2) and determined in accordance with Section 218.411(a)(1)(B).
3. VOM emissions from lithographic printing operations shall not exceed 1.5 tons/month and 7.0 tons/year. The VOM emissions shall be calculated using the following equations:

$$E = \sum (I_i \times V_{Ii}) + \sum (FS_j \times V_{FSj}) + \sum (CS_k \times V_{CSk})$$

Where:

E - VOM emissions (ton);

I_i - Ink usage (ton);

V_{Ii} - VOM content of ink (wt. fraction);

FS_j - Fountain solution usage (ton);

V_{FSj} - VOM content of fountain solution (wt. fraction);

CS_k - Cleaning solution usage (ton); and

V_{CSk} - VOM content of cleaning solution (wt. fraction).

These limits are based on the maximum production rate. A credit for 50% VOM retention may be used if cleaning solvents has vapor pressure less than 10 mm Hg and used cleaning towels are stored in closed containers. No credits shall be taken for ink VOM retention in the plastic substrate. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. VOM emissions from screen printing operations shall not exceed 2.0 tons/month and 16.5 tons/year. The VOM emissions shall be calculated using the following equations:

$$E = \sum U \times C_i - W \times C_w$$

Where:

E - VOM emissions (ton);

U - VOM-containing raw materials usage (ton);

C_i - VOM content of raw materials (wt. fraction);

W - Certified amount of waste disposed (ton); and

C_w - Certified VOM content of the waste (wt. fraction).

These limits are based on the maximum production rate. Compliance with annual limits shall be determined from a running total of 12 months of data.

5. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a

result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

6. The Permittee shall maintain records of the following items pursuant to 35 Ill. Adm. Code 218.411:
 - a. The name and identification of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line recorded each month.
 - b. A daily records which shows whether a lithographic printing line at the source was in operation on that day.
 - c. The VOM content and volume of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month.
 - d. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with applicable ink VOM emission adjustment) used at the source, calculated each month. No retention factor shall be used to calculate emissions from solvents used on the lithographic printing lines pursuant to 218.411(a)(1)(B)(iv).
 - e. The VOM emissions in lbs/day for the month, calculated in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B).
7. In addition, the Permittee shall maintain monthly records of the following items:
 - a. Plant-wide usage of VOM-containing materials (tons/mo, tons/yr);
 - b. VOM and HAP content of all materials in item (a) (weight %);
 - c. Certified amount of waste shipped off site (tons/mo, tons/yr);
 - d. Certified VOM content of the waste (weight %); and
 - e. VOM and HAP emission calculations (with applicable retention credits) (tons/mo, tons/yr).
8. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA 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 request for records during the course of a source inspection.

9. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
10. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
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

11. The Permittee shall submit the following additional information with the Annual Emission Report, due May 1st of each year: annual inks and solvents usage from the prior calendar year.

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

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

DES:VJB:jar

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the 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 well below the levels, e.g., 25 tons per year of 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 material is handled, and control measures are more effective than required in this permit.

1. VOM emissions from lithographic printing operations shall not exceed 1.5 tons/month and 7.0 tons/year. The VOM emissions shall be calculated using the following equations:

$$E = \sum (I_i \times V_{ii}) + \sum (FS_j \times V_{FSj}) + \sum (CS_k \times V_{CSk})$$

Where:

E - VOM emissions (ton);

I_i - Ink usage (ton);

V_{ii} - VOM content of ink (wt. fraction);

FS_j - Fountain solution usage (ton);

V_{FSj} - VOM content of fountain solution (wt. fraction);

CS_k - Cleaning solution usage (ton); and

V_{CSk} - VOM content of cleaning solution (wt. fraction).

2. VOM emissions from screen printing operations shall not exceed 2.0 tons/month and 16.5 tons/year. The VOM emissions shall be calculated using the following equations:

$$E = \sum U \times C_i - W \times C_w$$

Where:

E - VOM emissions (ton);

U - VOM-containing raw materials usage (ton);

C_i - VOM content of raw materials (wt. fraction);

W - Certified amount of waste disposed (ton); and

C_w - Certified VOM content of the waste (wt. fraction).

3. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

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