

217/782-2113

"REVISED"
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE

Sleepeck Printing Co.
Attn: Bruce Brazas
815 Twenty-Fifth Avenue
Bellwood, Illinois 60104

Application No.: 95090006 I.D. No.: 031015AAR
Applicant's Designation: Date Received: September 1, 1995
Operation of: Printing Plant
Date Issued: February 6, 1997 Expiration Date: February 6, 2002
Source Location: 815 - 25th Avenue, Bellwood, Cook County
Responsible Official: Michael W. Sleepeck, President

This permit is hereby granted to the above-designated Permittee to operate a printing plant, pursuant to the above-referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: July 31, 1998
Revision Date Issued: March 16, 1999
Purpose of Revision: Significant Modification

This significant modification incorporates the ERMS Section 6, additional Printing Press 17 and addition of two printing units to Printing Press 10.

If you have any questions concerning this permit, please call David Hulskotter at 217/782-2113.

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

DES:DWH:jar

cc: Illinois EPA, FOS, Region 1
USEPA

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS	5
3.0 INSIGNIFICANT ACTIVITIES	6
3.1 List of Insignificant Activities	
3.2 Insignificant Activities Revision Requirements	
4.0 SIGNIFICANT EMISSION UNITS	7
5.0 OVERALL SOURCE CONDITIONS	8
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Source-Wide Emission Limitations	
6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)	10
6.1 Description of ERMS	
6.2 Applicability	
6.3 Obligation to Hold Allotment Trading Units (ATUs)	
6.4 Market Transaction	
6.5 Emission Excursion Compensation	
6.6 Quantification of Seasonal VOM Emissions	
6.7 Annual Account Reporting	
6.8 Allotment of ATUs to the Source	
6.9 Recordkeeping for ERMS	
7.0 UNIT SPECIFIC CONDITIONS	16
7.1 Units 01-12 and 17 Non-Heatset Sheetfed Lithographic Presses	
8.0 GENERAL PERMIT CONDITIONS	24
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	
8.3 Emissions Trading Programs	
8.4 Operational Flexibility/Anticipated Operating Scenarios	
8.5 Testing Procedures	

8.6 Reporting Requirements

	<u>PAGE</u>
9.0 STANDARD PERMIT CONDITIONS	28
9.1 Effect of Permit	
General Provisions	
9.2 General Obligations of Permittee	
9.3 Obligation to Allow Illinois EPA Surveillance	
9.4 Obligation to Comply with Other Requirements	
9.5 Liability	
9.6 Recordkeeping	
9.7 Annual Emissions Report	
9.8 Requirement for Compliance Certification	
9.9 Certification	
9.10 Defense of Enforcement Actions	
9.11 Permanent Shutdown	
9.12 Reopening and Reissuing Permit for Cause	
9.13 Severability Clause	
9.14 Permit Expiration and Renewal	
10.0 ATTACHMENTS	
10.1 Attachment A - Example Certificate of Compliance	1-1

1.0 SOURCE IDENTIFICATION

1.1 Source

Sleepeck Printing Company
815 25th Avenue
Bellwood, Illinois 60104
708/544-8900

I.D. Number: 031015AAR

Standard Industrial Classification: 2799 Sheetfed Printing

1.2 Owner/Parent Company

William H. Sleepeck
Sleepeck Printing Company
815 25th Avenue
Bellwood, Illinois 60104

1.3 Operator

Michael W. Sleepeck
Sleepeck Printing Company
815 25th Avenue
Bellwood, Illinois 60104

1.4 Contact Person

Bruce A. Brazas
708/544-8900

1.5 General Source Description

Sleepeck Printing Company is located at 815 25th Avenue in Bellwood. The source is a commercial printer operating non-heatset sheetfed offset lithographic printing presses. The main products are brochures, pamphlets, flyers and posters.

2.0 LIST OF ABBREVIATIONS AND ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act, 415 ILCS 5/1 et seq.
BAT	Best Available Technology
Btu	British Thermal Unit
CAAPP	Clean Air Act Permit Program
C	Celsius
CAA	Clean Air Act, 42 U.S.C. Section 7401 et seq.
CFR	Code of Federal Regulations
F	Fahrenheit
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
Illinois EPA	Illinois Environmental Protection Agency
MACT	Maximum Achievable Control Technology
mmHg	Millimeters of Mercury
mo	Month
non-VOM	Nonvolatile Organic Material
NSR	New Source Review
lb	Pound
SIC	Standard Industrial Classification
t	Ton
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
yr	Year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities at the Source

The following activities constitute insignificant activities as specified in 35 IAC 201.210 and are present at the source:

3.1.1 The following activities proposed by the Permittee and determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a) and 201.211, as follows:

None

3.1.2 The following activities are insignificant activities based upon maximum emissions, pursuant to 35 IAC 202.210(a)(2) or (a)(3), as follows:

None

3.1.3 The following activities are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

6 fuel combustion units each with a rated heat input capacity of less than 2.5 million Btu/hour that fire only natural gas.

3.1.4 The Permittee denoted activities that are considered insignificant activities pursuant to 35 IAC 201.210(b) as being present at the source.

3.2 Revisions to Lists of Insignificant Activities or Emission Levels.

3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in this permit in Condition 3.1, until the renewal application for this permit is submitted pursuant to 35 IAC 201.212(a).

3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type identified in 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1 pursuant to 39.5(12)(b) of the Act.

3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at

the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Construction Date	Emission Control Equipment
01	Miehle Non-Heatset Sheetfed Lithographic Press 1	1963	None
02	Miehle Non-Heatset Sheetfed Lithographic Press 2	1969	None
03	Miehle Non-Heatset Sheetfed Lithographic Press 3	1969	None
04	Miehle Non-Heatset Sheetfed Lithographic Press 4	1972	None
05	Miehle Non-Heatset Sheetfed Lithographic Press 5	1979	None
06	Miehle Non-Heatset Sheetfed Lithographic Press 6	1981	None
07	Non-Heatset Sheetfed Lithographic Press 7	1993	None
08	Miehle Non-Heatset Sheetfed Lithographic Press 8	1973	None
09	Miehle Non-Heatset Sheetfed Lithographic Press 9	1985	None
10	Miehle Non-Heatset Sheetfed Lithographic Press 10	1969	None
11	Miehle Non-Heatset Sheetfed Lithographic Press 11	1964	None
12	Non-Heatset Sheetfed Lithographic Press 12	1996	None
17	Miehle Non-Heatset Sheetfed Lithographic Press 17	1998	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- a. This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.
- b. This permit is issued based on the source not being a major source of HAP.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to additional regulations as set forth in Section 7 (Unit - Specific Conditions) of this permit.

5.2.2 Fugitive Emission Requirements

- a. No person shall cause or allow any visible emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
- c. 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 the requirement set forth by Condition 5.2.2(b) and shall be submitted to the Illinois EPA pursuant to 35 IAC 212.312.
- d. All normal traffic pattern roads and parking facilities located at this source 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 Condition 5.2.2(b) [35 IAC 212.306].

- 5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.3 Source-Wide Emission Limitations

5.3.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0, for the purposes of fees shall not exceed the following. The overall source emissions shall be determined by adding all emission unit emissions. Compliance with these limits shall be determined on a calendar year basis. This condition is necessary to establish fees and is not federally enforceable.

<u>Pollutant</u>	<u>Tons/Year</u>
Volatile Organic Material (VOM)	58
Sulfur Dioxide (SO ₂)	--
Particulate Matter (PM)	--
Nitrogen Oxides (NO _x)	--
HAP, not included in VOM	--
TOTAL	58

5.3.2 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 regulation so that this source is considered a minor source for HAPs.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 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 further reasonable 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. Once the ERMS begins, 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 during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for 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 account to cover its actual VOM emissions during the preceding season. An 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 account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its 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 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 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 (35 IAC 205.710). Sources may also transfer or sell the ATUs that they holds to other sources or participants (35 IAC 205.630).

6.2 Applicability

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

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than 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 6.4.
 - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its 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 in Section 7.0 of this permit.

6.4 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 IAC 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 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 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 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, 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 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 emission 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 IAC 205.720(c), within 15 days of 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.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of 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 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 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 IAC 205.650(a), and shall be submitted in accordance with the following:
 - i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 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 Section 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 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 IAC 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 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 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 October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 291 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 32.99 tons.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Section 7 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 6.3(a) 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

There are no contingent allotments for this source.

- 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 IAC Part 205, including:

- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
- ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

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

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Non-Heatset Sheetfed Lithographic Printing Presses

7.1.1 Description

The lithographic printing process is used to produce brochures, pamphlets, flyers and posters. The Permittee operates non-heatset sheetfed offset lithographic printing presses. Emissions of VOM result from the use of printing-related materials such as inks, fountain solutions and cleaning solutions. The conditions of this permit are based on the Permittee not using automatic feed equipment on the printing presses.

Press 07, Press 12 and Press 17 were constructed in 1993, 1996 and 1998 respectively, therefore, specific emission limits and recordkeeping are required pursuant to 35 IAC Part 203 Major Stationary Sources Construction and Modification.

7.1.2 List of Emission Equipment

Emission Unit	Description
01 - 12 & 17	13 Non-Heatset Sheetfed Lithographic Presses

7.1.3 Applicable Control Requirements

Each of the non-heatset sheetfed web offset lithographic printing presses shall comply with the following:

- a. The VOM content of the as-applied fountain solution shall be 5 percent or less by volume [35 IAC 218.407(a)(3)].
- b. The cleaning solution shall comply with either
 - i. The VOM content of the as-used cleaning solution shall be less than or equal to 30 percent, by weight; or
 - ii. The VOM composite partial vapor pressure of as-used cleaning solution shall be less than 10 mmHg at 20EC (68EF).
- c. VOM containing cleaning materials, including used cleaning towels associated with any lithographic printing line shall be kept, stored

and disposed of in closed containers [35 IAC 218.407(a)(5)].

7.1.4 Emission Limitations

- a. Emissions and operation of Press 07 shall not exceed the following limits:

<u>Materials</u>	<u>Usage</u>		<u>VOM Emissions</u>	
	<u>(lb/mo)</u>	<u>(ton/yr)</u>	<u>(lb/mo)</u>	<u>(ton/yr)</u>
Ink and Coating	2,500	15	125	0.75
Fountain Solution	200	1.2	20	0.12
Cleaning Solution	800	4.8	400	<u>2.4</u>
				3.3

The above limitations were established for purposes of 35 IAC Part 203 Major Stationary Sources Construction and Modification.

- b. Emissions and operation of Press 12 shall not exceed the following limits that are also contained in construction permit 96090015.

<u>Materials</u>	<u>Usage</u>		<u>VOM Emissions</u>	
	<u>(lb/mo)</u>	<u>(ton/yr)</u>	<u>(lb/mo)</u>	<u>(ton/yr)</u>
Ink and Coating	2,500	15	125	0.75
Fountain Solution	200	1.2	20	0.12
Cleaning Solution and Solvents	800	4.8	800	<u>4.8</u>
				5.67

- c. Emissions and operation of Press 17 shall not exceed the following limits:

<u>Materials</u>	<u>Usage</u>		<u>VOM Emissions</u>	
	<u>(lb/mo)</u>	<u>(ton/yr)</u>	<u>(lb/mo)</u>	<u>(ton/yr)</u>
Ink and Coating	500	3.0	25	0.15
Fountain Solution	170	1.0	17	0.1
Cleaning Solution and Solvents	670	4.0	670	<u>4.0</u>
				4.25

The above limitations were established in Construction Permit 98070024. These limits ensure that the construction addressed in the aforementioned construction permit does not constitute a new major source or major

modification pursuant to 35 IAC Part 203.

- d. The limits in Condition 7.1.4 are based on maximum operation and material balance. The VOM content of the fountain solution is limited to 5% by volume in Condition 7.1.3 and the ink, coating and cleaning solution emission limitations were determined assuming worst case data of 100% VOM content. Compliance with annual limits shall be determined from a running total of 12 months of data.

7.1.5 Testing Requirements

- a. Upon request by the Illinois EPA, the VOM content of lithographic inks, fountain solutions, fountain solution additives, coatings and/or cleaning solvents shall be determined according to USEPA Reference Method 24 specified in 40 CFR 60 Appendix A, pursuant to 35 IAC 218.105(a). If cleaning solvents are complying with composite partial vapor pressures, then upon request by the Illinois EPA the composite partial vapor pressures shall be tested in accordance to 35 IAC 218.110.
- b. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solutions, and inks may be used to fulfill the testing requirements if such manufacturer's specifications are results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a) provided, however, Method 24 shall be used to determine compliance.

7.1.6 Monitoring Requirements

Fountain Solution Monitoring Requirements

The following monitoring requirements shall be performed according to 35 IAC 218.410 for the fountain solution. The Permittee shall comply with either (a) or (b) below.

- a. Maintain records of the VOM content of the fountain solution in accordance with Condition 7.1.7(a)(ii) of this permit; or
- b. Take a sample of the as-applied fountain solution from the fountain tray or reservoir, as applicable, each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution in the fountain tray or reservoir, and determine compliance with the VOM content limitation of the as-applied fountain solution by using one of the following methods:
 - i. With a refractometer or hydrometer with a visual, analog, or digital readout and with an accuracy of 0.5 percent. The

refractometer or hydrometer must be calibrated with a standard solution for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications, against measurements performed to determine compliance. The refractometer or hydrometer must be corrected for temperature at least once per 8-hour shift or once per batch of fountain solution prepared or modified, whichever is longer; or

- ii. With a conductivity meter if it is demonstrated that a refractometer and hydrometer cannot distinguish between compliant and noncompliant fountain solution for the type and amount of VOM in the fountain solution. A source may use a conductivity meter if it demonstrates that both hydrometers and refractometers fail to provide significantly different measurements for standard solutions containing 95 percent, 100 percent and 105 percent of the applicable VOM content limit. The conductivity meter reading for the fountain solution must be referenced to the conductivity of the incoming water. A standard solution shall be used to calibrate the conductivity meter for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications;

7.1.7 Recordkeeping Requirements

a. Fountain Solution Recordkeeping Requirements

- i. The Permittee shall collect and record the name and identification of each batch of fountain solution prepared for use on one or more lithographic printing lines, the lithographic printing line(s) or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch [35 IAC 218.411(c)(2)(A)].
- ii. For each batch of as-applied fountain solution, the following information shall

be collected and recorded [35 IAC 218.411(c)(2)(C)]:

- A. Date and time of preparation and each subsequent modification of the batch;
 - B. Volume and VOM content of each component used in, or subsequently added to, the fountain solution batch;
 - C. Calculated VOM content in terms of volume percent of the as-applied fountain solution; and
 - D. Any other information necessary to demonstrate compliance with the applicable VOM content limits.
- iii. As an alternative to (ii), the Permittee shall collect and record the following when a hydrometer, refractometer or conductivity meter is used to comply with the monitoring requirements [35 IAC 218.411(c)(2)(B)].
- A. The date and time of preparation of each batch of fountain solution, and each subsequent modification, of the batch;
 - B. The results of each measurement taken in accordance with 35 IAC 218.410(b)(1)(B) [Condition 7.1.6(b)]. Measurements are required to be taken each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution;
 - C. Documentation of the periodic calibration of the meter in accordance with the manufacturer's specifications, including date and time of calibration, personnel conducting, identity of standard solution, and resultant reading; and
 - D. Documentation of the periodic temperature adjustment of the meter, including date and time of adjustment,

personnel conducting and results;

b. Cleaning Solution Recordkeeping Requirements

i. For each batch of cleaning solution for which the owner or operator relies on the VOM content to comply with Condition 7.1.3(b), the Permittee shall collect and record the following information [35 IAC 218.411(d)(2)(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 VOM content of each cleaning solvent in the cleaning solution;

- 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 in weight percent of the as-used cleaning solution, with supporting calculations.
 - ii. For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to comply with Condition 7.1.3(b), the Permittee shall collect and record the following information [35 IAC 218.411(d)(2)(C)]:
 - 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;
 - 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 in mmHg at 20EC (68EF).
 - iii. The Permittee shall record 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 [35 IAC 218.411(d)(2)(D)].
- c. The Permittee shall collect and record the following information for the lithographic presses:
 - i. Total usage of each ink, coating, fountain

solution, cleaning solution and any other VOM containing material on an annual basis.

- ii. The VOM content of each ink, coating, fountain solution, cleaning solution and any other VOM containing materials used with basis, accompanied by a copy of the supporting information, e.g., supplier data sheet or laboratory analysis report.
- iii. The usage of ink, coating, fountain solution, cleaning solution and any other VOM containing materials used, in pounds, on each of lithographic presses 07, 12, and 17 on a monthly basis.
- iv. VOM emissions, calculated in accordance with Condition 7.1.9, as follows:
 - A. VOM emissions from presses 7, 12, and 17 on a monthly basis.
 - B. Total VOM emissions from the presses on an annual basis.
- v. The Permittee shall maintain an operating log that states which method of compliance is being used for the cleaning solutions and the dates each method is used.

7.1.8 Reporting Requirements

a. Report of Deviations

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 [Section 39.5(7)(f)(ii) of the Act].

b. Report for Changing Method of Compliance

If the Permittee changes the method of

demonstrating compliance with the applicable VOM content limitations in 35 IAC 218.407 or changes the method of demonstrating compliance with the VOM content limitations for fountain solutions or cleaning solutions, the Permittee shall certify compliance for such new methods in accordance with the requirements of the certification reports of Condition 9.8 within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing line(s) will be in compliance with the applicable requirements of 35 IAC 218.407 and the requirements of this permit [35 IAC 218.411(c)(4) and (d)(4)].

7.1.9 Compliance Procedures

- a. Compliance with emission limits shall be determined using the emission factors and formulas listed below:

The Permittee may presume 95% retention of ink VOM in the web for non-heat offset lithographic presses, as stated in 35 IAC 218.411(a)(1)(B)(iii).

- b. Emission Calculations for Non-Heatset Offset Lithographic Presses shall be based on the following:

Ink VOM Emissions = VOM Contained in Ink x
(0.05)

Fountain Solution VOM Emissions = VOM
Contained in Fountain Solution

Cleaning Solution VOM Emissions = VOM
Contained in Cleaning Solution

For manual cleaning solution with a VOM composite partial vapor pressure less than 10 mmHg at 20EC the following equation may be used in place of the above cleaning solution emission determination method provided proper handling is performed as stated in Condition 7.1.3(c). This is stated in USEPA's Alternative Control Techniques Document Offset Lithographic Printing (EPA 453/R-94-054, June 1994):

Cleaning Solution VOM Emissions = Cleaning

Solution VOM Usage x 0.5

For low vapor pressure coatings that have similar properties to the non-heatset ink, the 95% retention factor may also be used for these type of coatings.

Other VOM Emissions = VOM Contained in
Other Materials

Total VOM Emissions = Ink VOM Emissions +
Fountain Solution VOM Emissions + Cleaning
Solution VOM Emissions + Other VOM
Emissions

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after December 7, 1998 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any approved economic incentives, marketable permits, emissions trading, or other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Environmental Protection Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA and emissions will not exceed the emissions allowable under the permit following implementation of the physical or operational change and the Permittee provides written notice to Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials; efficiency of pollution control devices; emissions from process or control equipment; or other process, emissions, or composition parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Compliance Unit of the Bureau of Air every six

months as follows [Section 39.5(7)f of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Reports

Unless otherwise specified elsewhere in the permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests and/or analyses; and
- g. The operating conditions at the time of the sampling or measurements.

8.6.3 Reporting Addresses:

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency (MC 40)
Bureau of Air
Compliance Section
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 First Avenue
Maywood, Illinois 60153
 - iii. Illinois EPA - Air Permit Section (MC-11)

Illinois Environmental Protection Agency

Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA - Air Branch

United States EPA (AR - 18J)
Air and Radiation Branch (Illinois - Indiana)
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in the permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the Clean Air Act, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of the permit. Any permit noncompliance constitutes a violation of the Clean Air Act and the Act and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, or modification, or denial of a permit

renewal application. [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternative schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any air emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard, or permit limitation unless such malfunction or breakdown is allowed by a permit condition. [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations or activities shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi)]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents,

the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

- c. Inspect during hours of operation any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor any substances or parameters at any location;
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or this Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge, or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the facilities.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents, or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of regulated air pollutants subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes.

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [Section 39.5(7)(e)(ii) of the Act]
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certifications shall include descriptions on means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications must be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA. [Section 39.5(7)(p)(v)(D) of the Act].
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required by a CAAPP permit shall contain certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defenses to Enforcement Action

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency, shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operation logs, or other relevant evidence:
 - i. An emergency occurred as provided in Subsection 7(k) of Section 39.5 of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted facility was at the time being properly operated;
 - iii. The Permittee shall submit notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in the permit.
- b. This provision is in addition to any emergency or upset provisions contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shutdown. This permit expires if all equipment is removed, notwithstanding the expiration date specified on the permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

9.12.2 Reopening and Revision

The permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that the permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of the permit; and
- d. The Illinois EPA or USEPA determines that the permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon information submitted by the Permittee in the permit application. Any misinformation, false statement, or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(a)(iii) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in

writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality. [Section 39.5(7)(o)(v) of the Act]

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be invalid or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if the permit did not contain the particulate provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions. [Section 39.5(5)(1) and (n) of the Act]

10.0 ATTACHMENTS

10.1 Attachment A - Example Certificate of Compliance

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

DWH:jar

REQUEST FOR ADDITIONAL INFORMATION
CAAPP PERMIT APPLICATION

May 14, 1996

Sleepeck Printing Company
Attn: Bruce A. Brazas
815 - 25th Avenue
Bellwood, Illinois 60104

I.D. Number: 031015AAR
Application Number: 95090006
Date Received: September 1, 1995
Applicant's Designation:
Operation of: Sheetfed - Offset Lithographic Printing Co.
Location: 815 - 25th Avenue, Bellwood

The application for the Clean Air Act Permit Program (CAAPP) permit referenced above lacks information necessary to evaluate the source and to take final action on the CAAPP application. As such, pursuant to Section 39.5(5)(g) of the Environmental Protection Act Section (Act) and 35 Ill. Adm. code 270.305, the Agency is requesting the following information:

1. Information documenting compliance with 35 Ill. Adm. Code 218.407(a)(4) cleaning solution requirements for lithographic printing.
 - a. Provide the volatile organic material (VOM) contents of the cleaning solutions used. This regulation requires that the VOM content of the as-used cleaning solution must be less than or equal to 30 percent by weight; or
 - b. Provide the VOM composite partial vapor pressure of the cleaning solutions used. This regulation requires that the VOM composite partial vapor pressure of the as-used cleaning solution must be less than 10 mmHg at 68°F.
2. Provide the construction dates of the 11 printing presses. If the construction dates of the presses are unknown but they were constructed prior to November 15, 1990, indicate that they were constructed prior to November 15, 1990. If any presses were constructed after November 15, 1990, provide the date of construction or the approximate date of construction.
3. Provide the maximum VOM content of the ink used along with the maximum ink density.

4. The CAAPP application indicates that the hot water heaters and the dock heater have maximum firing rates ranging from 34,000 million Btu/hr to 200,000 million Btu/hr. This is a possible error state what the firing rates of the hot water heaters and dock heater are.

Page 2

5. Provide MSDS sheets for cleaning solutions and inks and VOM content test results, if any.
6. Is there a paper scrap collection system at your plant that emits air emissions? If there is, a 220-CAAPP form should be completed and a 260-CAAPP form should be completed for any air pollution control equipment such as a cyclone or dust collector.

Failure to supply this information by June 22, 1996 may require the Agency to deny this permit application. This date may be extended upon request by the applicant provided the Agency agrees to such extension. The Agency reserves the right to request additional information as needed to evaluate or take final action on the above referenced permit pursuant to Section 39.5(5)(g) of the Act. Two copies of this information are required and will serve as a supplement to your application.

Please reference the application and I.D. numbers assigned above on any submission of additional information or any correspondence concerning this matter.

If you have any questions about this letter, please contact David Hulskotter at 217/782-2113.

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

DES:DWH:jar

Enclosures

cc: Region 1

217/782-2113

August 13, 1996

Sleepeck Printing Co.
Attn: Bruce Brazas
815 - 25th Avenue
Bellwood, Illinois 60104

Re: Preliminary Draft Title V - Clean Air Act Permit Program Operating
Permit

Dear Mr. Brazas:

Enclosed please find one preliminary draft Clean Air Act Permit Program (CAAPP) permit for Sleepeck Printing Company's printing facility located at 815 - 25th Avenue, Bellwood, for your review. Please review this draft permit, and provide your comments no later than September 10, 1996.

If you have any questions on this, please contact David Hulskotter at 217/782-2113.

Sincerely,

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

DES:DWH:jar

Enclosure

cc: FOS, Region 1

I. INTRODUCTION

Sleepeck Printing Company (Sleepeck) has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing printing company. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. Unlike Sleepeck's current state operating permits, the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

II. SOURCE DESCRIPTION

Sleepeck is located at 815 Twenty-Fifth Avenue in Bellwood, Illinois. This facility is a commercial printer operating twelve non-heatset lithographic printing presses. The main products are brochures, pamphlets, flyers and posters.

Sheetfed offset inks used today for general commercial printing are quickset types. These inks set rapidly as the inks oil component penetrates the substrate and subsequently dry as the vehicle cures by oxidation. Sheetfed offset inks are not dried with the assistance of drying ovens, though some sheet presses are equipped with infra-red dryers which supply low levels of heat to assist in the setting of ink.

For certain products varnishes (coatings) are applied over inked areas to enhance appearance (glossy finish) or protect the inks from abrasion. The application and formulation of the varnishes are very similar to inks except there is no pigment and therefore no color.

The non-image area of the press plate is wetted continuously with a mild solution composed of water and additives called a fountain solution. A small amount of VOM is present from glycols used as wetting agents and corrosion inhibitors used to protect the non-image area of the plate.

Cleaning solutions are used to manually clean the blanket cylinders, ink rollers and other parts of the presses to maintain the quality of the process and for general housekeeping.

III. EMISSIONS

The principal air contaminant of concern for any type of printing is volatile organic material (VOM), from the solvent contained in the inks, fountain solutions, cleaning solutions and other materials used that contain VOM. When these materials are used, the VOM in them evaporates into the atmosphere.

Sleepeck is required to have a CAAPP permit since it is a major source of VOM emissions. The proposed permit limits the maximum annual emissions of VOM from significant emission units at the source to 58 tons per year. Historically, based on annual emission report information, VOM emissions have been considerably lower than

this. The limit accounts for historical operation as well as a potential increase in business. This limit will ensure that the plant is not a major source of hazardous air pollutants. Insignificant activities at the company are not accounted for in the source limit. These emission units include hot water heaters and small boilers.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

Sleepeck's printing presses are subject to 35 Ill. Adm. Code 218.407. This regulation requires that the VOM content of the as-applied fountain solution does not exceed 5 percent by volume and requires the VOM content of the cleaning solution to be less than 30 percent or the cleaning solution to have a VOM composite partial vapor pressure less than 10 mmHg at 68°F.

As part of its application, Sleepeck has certified that it is in full compliance with applicable requirements. The Illinois EPA's review of the application and on-site inspections also indicate that the printing company is in compliance. There are no rules, regulations, or requirements with future compliance dates that would apply to Sleepeck that need to be addressed by this CAAPP permit.

V. PROPOSED PERMIT

A CAAPP permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits and appropriate compliance procedures. The appropriate compliance procedures include inspection practices, monitoring, recordkeeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that Sleepeck's permit application meets the standards for issuance of a CAAPP permit. Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions as proposed in the draft 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 Ill. Adm. Code Part 164.

217/782-2113

October 26, 1998

Sleepeck Printing Company
Attn: Bruce Brazas
815 - 25th Avenue
Bellwood, Illinois 60104

Re: Sheetfed Commercial Printer
95090006
Notice of Public Comment Period

Dear Mr. Brazas:

The Illinois EPA will be soliciting public comments on the proposed issuance of a revised Clean Air Act Permit Program permit for the above project, with an opportunity for a public hearing. The Illinois EPA is authorized by 35 Ill. Adm. Code Part 252 to make permit applications and the Illinois EPA's proposed actions on permit applications available for public comment and hearing. Since the application is subject to public comment, with opportunity for a public hearing, the Illinois EPA has 180 days to take final action on the application under Section 39(a) of the Environmental Protection Act.

If you have any questions on this matter, please contact David Hulskotter.

Sincerely,

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

DES:DWH:psj

cc: Brad Frost

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. Unlike this source's current state operating permit(s), the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Sleepeck Printing Company is located at 815 - 25th Avenue in Bellwood. This source is a commercial printer operating non-heatset sheetfed offset lithographic printing presses. The main products are brochures, pamphlets, flyers and posters.

Sleepeck Printing Company has been issued an initial CAAPP permit. This permit revision will add the Emission Reduction Market System Regulations to the permit, which will be in Section 6 of the permit. This revision will also add an additional printing press and two printing units to existing Press 10.

II. EMISSION UNITS

Emission Unit	Description	Construction Date	Emission Control Equipment
01	Miehle Non-Heatset Sheetfed Lithographic Press 1	1963	None
02	Miehle Non-Heatset Sheetfed Lithographic Press 2	1969	None
03	Miehle Non-Heatset Sheetfed Lithographic Press 3	1969	None
04	Miehle Non-Heatset Sheetfed Lithographic Press 4	1972	None
05	Miehle Non-Heatset Sheetfed Lithographic Press 5	1979	None
06	Miehle Non-Heatset Sheetfed Lithographic Press 6	1981	None
07	Non-Heatset Sheetfed Lithographic Press 7	1993	None
08	Miehle Non-Heatset Sheetfed Lithographic Press 8	1973	None
09	Miehle Non-Heatset Sheetfed Lithographic Press 9	1985	None
10	Miehle Non-Heatset Sheetfed Lithographic Press 10	1969	None
11	Miehle Non-Heatset Sheetfed Lithographic Press 11	1964	None
12	Non-Heatset Sheetfed Lithographic Press 12	1996	None

17	Miehle Non-Heatset Sheetfed Lithographic Press 17	1998	None
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III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions. The proposed permit limits the maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source limit.

For purposes of fees, the source is allowed the following emissions:

<u>Pollutant</u>	<u>Tons/Year</u>
Volatile Organic Material (VOM)	58
Sulfur Dioxide (SO ₂)	--
Particulate Matter (PM)	--
Nitrogen Oxides (NO _x)	--
HAP, not included in VOM	--
TOTAL	58

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

A CAAPP permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

Because this source is located in the Chicago ozone nonattainment area and emits volatile organic material, the permit includes conditions to implement the Emission Reduction Market System (ERMS).

The ERMS is a market-based program designed to reduce emissions from stationary sources to contribute to further reasonable progress toward attainment, as further described in section 6 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS.

The permit also provides that the source must begin to operate under the ERMS following the initial issuance of trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emission reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft 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 Ill. Adm. Code Part 164.

DWH:jar