

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

Project Summary for an Application from  
INX International Ink Company for  
Federally Enforceable State Operating Permit (FESOP) for  
150 North Martingale Road, Suite 700  
Schaumburg, Illinois plant

Site Identification No.: 031135ABB  
Application No.: 08040004

Schedule

Public Comment Period Begins: June 23, 2010  
Public Comment Period Closes: July 23, 2010

Illinois EPA Contacts

Permit Analyst: Valeriy Brodsky  
Community Relations Coordinator: Brad Frost

## **I. INTRODUCTION**

INX International Ink Company has voluntarily applied for an operating permit for its printing inks manufacturing facility in order to incorporate federally enforceable limits. These limits would prevent the facility from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. 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 revised 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**

The INX International is an ink manufacturing plant. Process equipment includes dozens of raw material storage tanks, mixers, dispensers. Raw materials, solids and liquids, are premixed and transferred to dispensers where solids size further reduced and final adjustments are made. The final products are packaged into various size containers.

## **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 not 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 Board's emission standards addressing VOM

emissions from the paint and ink manufacturing plant are found in 35 Ill. Adm. Code, Part 218 Subpart AA.

The company's operations are subject to general VOM emission limitations of Subpart G. The application shows that the facility is in compliance with applicable state emission standards.

## **V. CONTENTS OF THE PERMIT**

The permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant. As explained, the ink manufacturing operations conducted at the plant are subject to 35 Ill. Adm. Code, Part 218 Subparts AA requirements.

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

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

## **VI. REQUEST FOR COMMENTS**

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

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