

MANUFACTURING OPERATION

<u>Material</u>	VOM Usage		VOM	% Retention	VOM Emissions	
	(T/Mo)	(T/Yr)	Content (wt. %)		(T/Mo)	(T/Yr)
Inks	5.0	50	29	95	0.08	0.74
Fountain Solution	0.5	5.0	21	--	0.11	1.1
Cleaning Solution	1.1	11.0	89	--	0.98	9.8
				Total	1.17	11.64

These limits define the potential emissions of VOM and are based on maximum material usage, maximum VOM content, and 95 percent retention of the inks. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. This permit is issued based on emissions from the manufacturing area remaining less than permitted emission limits from the replacement of 2 non-heatset offset lithographic printing presses.
3. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
4. This permit is issued based on negligible emissions of particulate matter and volatile organic material from the lead melting furnace. For this purpose emissions of each contaminant, shall not exceed nominal emission rates of 0.05 lb/hr and 0.22 ton/yr.
5. The Permittee must comply with the following emission limitations and control requirements for the non-heatset web offset and sheetfed lithographic printing lines, pursuant to 35 Ill. Adm. Code 218.407:
 - a. The VOM content of the as applied fountain solution shall not exceed 5.0 percent, by volume, and shall not contain alcohol;
 - b. The VOM composite partial vapor pressure of the as-used cleaning solution shall be less than 10 mmHg at 20°C (68°F); and
 - c. The VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line must be kept, stored, or disposed of in closed containers.
6. Testing to determine compliance with the requirements of 35 Ill. Adm. Code 218.407 shall be conducted by the owner or operator within 90 days after a request by the Agency, pursuant to 35 Ill. Adm. Code 218.409. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Agency in writing 30 days in advance of conducting such testing to allow the Agency to be present during such testing.

7. The Permittee shall comply with the following monitoring requirements for all lithographic printing lines, pursuant to 35 Ill. Adm. Code 218.410:
 - a. Determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level;
 - b. Install, maintain, calibrate and operate the equipment used to make automatic additions in accordance with manufacturer's specifications; and
 - c. Keep records for cleaning solutions used on any such lines as set forth in 35 Ill. Adm. Code 218.411 (d) (2) (C).

8. The Permittee shall perform the following recordkeeping and reporting requirements for lithographic printing lines, pursuant to 35 Ill. Adm. Code 218.411 to show compliance with the emission limitations and control requirements of to 35 Ill. Adm. Code 218.407 and the testing requirements of to 35 Ill. Adm. Code 218.409:
 - a. The Permittee shall collect and record the following information for each fountain solution used on each printing line:
 - i. 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.
 - b. The Permittee shall collect and record the following information for each cleaning solution used on each printing line:
 - i. Name and identification of each cleaning solution;
 - ii. Date and time of preparation and each subsequent modification of the batch;
 - iii. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent as determined in accordance with Section 219.409 (e);
 - iv. Total amount of each cleaning solvent used to prepare the as-used cleaning solution;
 - v. The VOM composite partial vapor pressure of each as-used cleaning solution;
 - vi. 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 close containers, with descriptions of actual practice and corrective action taken, if any; and

- c. If changing its method of demonstrating compliance with the applicable limitations in Section 218.407 of this Subpart, certify compliance for such new method(s) in accordance with 218.411 (c) (1) 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 Section 218.407 of this Subpart.
9. The Permittee shall maintain monthly records of the following items:
 - a. Amount of each ink, fountain solution, and cleaning solvent used in the imprinting operation (ton/mo and ton/yr);
 - b. Amount of each ink, fountain solution, and cleaning solvent used in the manufacturing operation (ton/mo and ton/yr);
 - c. VOM content of each ink, fountain solution, and cleaning solvent used (lb VOM/gal or percent weight); and
 - d. Detailed calculations of VOM emissions (ton/mo and ton/yr).
 10. 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.
 11. 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.
 12. 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

13. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: Amount of each ink, fountain solution, and cleaning solvent used in the imprinting operation (ton/mo and ton/yr); amount of each ink, fountain solution, and cleaning solvent used in the manufacturing operation (ton/mo and ton/yr); VOM content of each ink, fountain solution, and cleaning solvent used (lb VOM/gal or percent weight); and detailed calculations of VOM emissions (ton/mo and ton/yr).

It should be noted that this permit incorporates Construction Permit #00110080 to include plant wide limits and the construction of two new presses.

It should also be noted that 2 non-heatset offset lithographic printing presses have been replaced by 2 presses from Construction Permit 03040032.

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

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

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

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from lithographic printing presses 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. This is handling approximately 100 tons per year of inks, fountain solutions, and cleanup solvents. The resulting maximum emissions are well below the levels, e.g., 25 tons/yr of VOM at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

- 1a. Source wide emissions of volatile organic material (VOM) and operation of the 2 non-heatset sheetfed offset lithographic presses, 3 non-heatset web offset lithographic presses, 29 non-heatset sheetfed lithographic presses, and 15 non-heatset sheetfed lithographic presses with thermography units shall not exceed the following limits:

IMPRINTING OPERATION

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Content</u>		<u>VOM Emissions</u>	
	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(wt. %)</u>	<u>% Retention</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Inks	2.5	25	25	95	0.04	0.32
Fountain Solution	0.15	1.5	12	--	0.02	0.18
Cleaning Solution	0.75	7.5	100	--	<u>0.75</u>	<u>7.5</u>
				Total	0.8	8.0

MANUFACTURING OPERATION

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