

Attention:

Graphic Packaging International, Inc.  
Attn: Abiola Adeoye  
400 East North Avenue  
Carol Stream, Illinois 60188

State of Illinois

CLEAN AIR ACT PERMIT  
PROGRAM (CAAPP) PERMIT

Source:

Graphic Packaging International, Inc.  
400 East North Avenue  
Carol Stream, Illinois 60188

I.D. No.: 043020AAC  
Permit No.: 95090022

Permitting Authority:

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
217/785-1705

**CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT**

Type of Application: Renewal  
Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 043020AAC  
Permit No.: 95090022  
Statement of Basis No.: 95090022-1304

Date Application Received: December 29, 2011  
Date Issued: October 22, 2013

Expiration Date: October 22, 2018  
Renewal Submittal Date: 9 Months Prior to October 22, 2018

Source Name: Graphic Packaging International, Inc.  
Address: 400 East North Avenue  
City: Carol Stream  
County: DuPage  
ZIP Code: 60188

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact Justin Cameron at 217/785-1705.

Robert W. Bernoteit  
Acting Manager, Permit Section  
Division of Air Pollution Control

RWB:MTR:JTC:psj

cc: IEPA, Permit Section  
IEPA, FOS, Region 1  
Lotus Notes Database

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**Section 1 - Source Information**

**1. Addresses**

Source

Graphic Packaging International, Inc.  
400 East North Avenue  
Carol Stream, Illinois 60188

Owner

Graphic Packaging International, Inc.  
835 A-1 Franklin Court  
Marietta, Georgia 30067

Operator

Graphic Packaging International, Inc.  
400 East North Avenue  
Carol Stream, Illinois 60188

Permittee

The Owner or Operator of the source as identified in this table.

**2. Contacts**

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	Ed Dieter	Plant Manager
<i>Delegated Authority</i>	No other individuals have been authorized by the IEPA.	N/A

Other Contacts

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Abiola Adeoye	630-260-6595	N/A
<i>Technical Contact</i>	Abiola Adeoye	630-260-6595	N/A
<i>Correspondence</i>	Abiola Adeoye	630-260-6595	N/A
<i>Billing</i>	Abiola Adeoye	630-260-6595	N/A

**3. Single Source**

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
N/A	N/A	N/A

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## Section 2 - General Permit Requirements

### 1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

### 2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
  - i. An emergency occurred and the source can identify the cause(s) of the emergency.
  - ii. The source was at the time being properly operated.
  - iii. The source submitted notice of the emergency to the IEPA within 2 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.
  - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

### **3. General Provisions**

#### **a. Duty to Comply**

The source must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA 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]

#### **b. Need to Halt or Reduce Activity is not a Defense**

It shall not be a defense for the source 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]

#### **c. Duty to Maintain Equipment**

The source 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. [Section 39.5(7)(a) of the Act]

#### **d. 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 Act or regulations promulgated there under. [Section 39.5(7)(a) of the Act]

#### **e. Duty to Pay Fees**

- i. The source must pay fees to the IEPA 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) of the Act]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

#### **f. Obligation to Allow IEPA Surveillance**

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
  - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
  - B. As otherwise authorized by the Act.
- v. 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 authorized by this permit.

**g. Effect of Permit**

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
  - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
  - B. The liability of the Owner or Operator of the 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.
  - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

**h. Severability Clause**

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

**4. Testing**

- a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of

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any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
  - i. Testing by Owner or Operator: The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
  - ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

## **5. Recordkeeping**

### **a. Control Equipment Maintenance Records**

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates maintenance was performed and the nature of preventative maintenance activities.

### **b. Retention of Records**

- i. 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 this permit. [Section 39.5(7)(e)(ii) of the Act]
- ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

### **c. Availability of Records**

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of

requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

## 6. Certification

### a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
  - A. The identification of each term or condition of this permit that is the basis of the certification.
  - B. The compliance status.
  - C. Whether compliance was continuous or intermittent.
  - D. 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.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

### b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

## 7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source 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 IEPA, 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 September 6, 2013 (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

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- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

## 8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR".
- i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
- ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN".
- i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
- ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

## 9. Reopening and Revising Permit

### a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, 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]

### b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

### c. Inaccurate Application

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

### d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

## 10. Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and 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 Act]

## 11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(1) and (o) of the Act]

- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

**12. Permanent Shutdown**

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this 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 shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

**13. Startup, Shutdown, and Malfunction**

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

## Section 3 - Source Requirements

### 1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

#### a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.
- ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

#### b. Emissions Reduction Market System (ERMS)

Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS. The allotment of ATUs to this source is 1,431 ATUs per seasonal allotment period. The Permittee shall comply with all applicable requirements in Section 7.3.

#### c. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), 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:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.

- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

**d. Asbestos Demolition and Renovation**

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or demolish pursuant to Condition 3.1(d)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.
- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

**e. Future Emission Standards**

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

<b>2. <u>Applicable Plans and Programs</u></b>
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Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

**a. Fugitive PM Operating Program**

Should this source become subject to 35 IAC 212.302, the Permittee shall prepare and operate under a Fugitive PM Operating Program consistent with 35 IAC 212.310 and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). Any future Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the Fugitive PM Operating Program is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Fugitive PM Operating Program. In the event that the IEPA notifies the Permittee of a deficiency with any Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

**b. PM<sub>10</sub> Contingency Measure Plan**

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM<sub>10</sub> Contingency Measure Plan reflecting the PM<sub>10</sub> emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM<sub>10</sub> Contingency Measure Plan.

**c. Episode Action Plan**

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.
- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on October 23, 2012, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO<sub>2</sub>, PM<sub>10</sub>, NO<sub>2</sub>, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- v. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

**d. Risk Management Plan (RMP)**

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

**3. Title I Requirements**

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Condition.

**4. Synthetic Minor Limits**

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

**a. Prompt Reporting**

Graphic Packaging International, Inc.  
 I.D. No.: 043020AAC  
 Permit No.: 95090022

Date Received: 12/29/2011  
 Date Issued: 10/22/2013

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
  - I. Requirements in Conditions 3.1(a)(i), 3.1(b), 3.1(c), and 3.1(d).
  - II. Requirements in Conditions 3.2(a), 3.2(b), 3.2(c), and 3.2(d).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

**b. Semiannual Reporting**

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	July 31
July through December	January 31

- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

**c. Annual Emissions Reporting**

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report to the Air Quality Planning Section, due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

## Section 4 - Emission Unit Requirements

### 4.1 Sheet-fed, Non-Heatset Offset Lithographic Printing Operation Presses #2, #4, #5a, and #6

#### 1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Press #2	PM and VOM	1999	N/A	None	None
Press #4	PM and VOM	1990	N/A	None	None
Press #5a	PM and VOM	2003	N/A	None	None
Press #6	PM and VOM	2011	N/A	None	None

#### 2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act. In addition, Press #2, Press #4, and Press #5a shall comply with the applicable requirements in Section 5.1.

##### a. i. Opacity Requirements

- A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

##### ii. Compliance Method (Opacity Requirements)

###### Monitoring

- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each press or common stack in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the press, maintenance and repair and/ or adjustment of operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

###### Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

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b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2).

ii. Compliance Method (PM Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:

I. The hours of operation for each printing press, hr/mo and hr/yr.

II. The emissions of PM from each printing line, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the hourly limits of 35 IAC 212.321.

c. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and with the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

B. Pursuant to 35 IAC 218.407(a)(3)(A), no owner or operator of lithographic printing lines shall cause or allow the operation of any sheet-fed offset lithographic printing line unless the VOM content of the as-applied fountain solution is 5 percent or less, by weight.

C. Pursuant to 35 IAC 218.407(a)(4), no owner or operator of lithographic printing lines shall cause or allow the use of a cleaning solution on any lithographic printing line unless:

I. The VOM content of the as-used cleaning solution is less than or equal to 30 percent, by weight; or

II. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F).

D. Pursuant to Construction Permit #99030028, VOM emissions from Lithographic Printing Press #2 shall not exceed 4.0 tons/month and 24.9 tons/year. [T1]

Note: See Section 7.4(a), Condition 1.1.5(a) of Construction Permit #11080050, for combined VOM emission limits and combined production limits established for Presses #6 and #7 (Press #7 has not been constructed as of the date of issuance of this Permit).

ii. Compliance Method (VOM Requirements)

Monitoring

A. Pursuant to 35 IAC 218.410(b)(2), the Permittee shall determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions to VOM up to a pre-set level.

The equipment used to make automatic additions must be calibrated, operated and maintained in accordance with manufacturer specifications.

- B. I. Pursuant to 35 IAC 218.410(e)(1), the owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with 35 IAC 218.407(a)(4)(A) must:
  - 1. For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):
    - i) Operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed; and
    - ii) Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with 35 IAC 218.407(a)(4)(A);
  - 2. For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) according to Condition 4.1.2(c)(ii)(G)(II).
- II. Pursuant to 35 IAC 218.410(e)(2), the owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with 35 IAC 218.407(a)(4)(B) must keep records for such cleaning solutions used on any such lines as set forth in Condition 4.1.2(c)(ii)(G)(III).

Testing

- C. Pursuant to 35 IAC 218.409(c), testing to demonstrate compliance with the applicable VOM content limitations under Conditions 4.1.2(c)(i)(B) and 4.1.2(c)(i)(C)(I) shall be conducted as follows:
  - I. On an annual basis, the VOM content of the fountain solution "as applied" shall be determined by Method 24 of 40 CFR 60, Appendix A.
  - II. On an annual basis, the VOM content of cleaning solvents shall be determined by Method 24 and Method 24A of 40 CFR 60, Appendix A.
  - III. The manufacturer's specifications for VOM content for fountain solution additives and cleaning solvents may be used if such manufacturer's specifications are based on the results of tests of VOM content conducted in accordance with Method 24 and/or Method 24A of 40 CFR 60, Appendix A, and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent.
- D. Pursuant to 35 IAC 218.409(e), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 IAC 218.110.
- E. If the Permittee intends to take credit for VOM containing waste shipped off-site, then the percent concentration of solvent in the VOM containing waste from the press shall be determined according to USEPA Test Methods for

Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

Recordkeeping

- F. I. Pursuant to 35 IAC 218.411(e)(2)(A), the owner or operator 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 lines or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch.
- II. Pursuant to 35 IAC 218.411(e)(2)(D), the Permittee shall collect and record the following for each automatic feed equipment setting:
1. VOM content limit corresponding to each setting;
  2. Date and time of initial setting and each subsequent setting; and
  3. Documentation of the periodic calibration of the automatic feed equipment in accordance with the manufacture's specifications.
- G. Pursuant to 35 IAC 218.411(f)(2)(A-C), the owner or operator shall collect and record the following information for each cleaning solution used on each printing line:
- I. For each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 IAC 218.407(a)(4)(A) and that is prepared at the source with automatic equipment:
1. The name and identification of each cleaning solution;
  2. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 IAC 218.409(c);
  3. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
  4. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
  5. The VOM content of the as-used cleaning solution, with supporting calculations; and
  6. A calibration log for the automatic equipment, detailing periodic checks.
- II. For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 IAC 218.407(a)(4)(A) and which is not prepared at the source with automatic equipment:
1. The name and identification of each cleaning solution;
  2. Date and time of preparation, and each subsequent modification, of the batch;

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3. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 IAC 218.409(c);
  4. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
  5. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a).
- III. For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with 35 IAC 218.407(a)(4)(B):
1. The name and identification of each cleaning solution;
  2. Date and time of preparation, and each subsequent modification, of the batch;
  3. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with 35 IAC 218.409(e). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 IAC 218.105(a) and 218.110;
  4. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
  5. The VOM composite partial vapor pressure of each as-used cleaning solution in mmHg at 20°C (68°F). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 IAC 218.105(c) and 218.110.
- H. Pursuant to 39.5(7)(b) of the Act, the Permittee shall maintain the following records:
- I. The emissions of VOM from each press, tons/mo and ton/yr (12 month rolling average), with supporting calculations.
  - II. Hours of operation for each printing line (hr/month and hr/year).
  - III. The following information shall be kept for each Press:
    1. The usage of ink, coating, fountain solution, cleaning solution and any other VOM containing materials used (lb/month and ton/year).
    2. VOM content of as-applied cleaning solution and fountain solution.

IV. Results of VOM content testing for VOM containing waste, if applicable.

d. i. Work Practice Requirements

- A. Pursuant to 35 IAC 218.407(a)(5), no owner or operator of lithographic printing lines shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored or disposed of in any manner other than in closed containers, except when specifically in use.
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate each press in a manner consistent with good air pollution control practice for minimizing emissions and the manufacturer(s) maintenance procedures, as specified.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform preventive maintenance on each press in accordance with the manufacturer(s) recommendation(s).
- B. Pursuant to 35 IAC 218.411(f)(2)(D) and Sections 39.5(7)(a & d) of the Act, the Permittee shall perform monthly inspections of VOM-containing cleaning material containers to ensure that the work practice requirements of 35 IAC 218.407(a)(5) are performed.

Recordkeeping

- C. Pursuant to 35 IAC 218.411(f)(2)(D) and Section 39.5(7)(b) of the Act, the Permittee shall collect and record the following for each inspection performed, as required by Condition 4.1.2(d)(ii)(B), to ensure compliance with 35 IAC 218.407(a)(5):
  - I. Date, time and duration of the inspections performed;
  - II. Name(s) of inspection personnel;
  - III. Identification of work practices being inspected;
  - IV. Any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any.
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of preventive maintenance performed, as required by Condition 4.1.2(d)(ii)(A), along with a maintenance and repair log. These records shall include, at a minimum:
  - I. Date and time of the preventive maintenance activity;
  - II. Name(s) of personnel performing the preventative maintenance;
  - III. Identification of the press on which preventive maintenance is being performed;
  - IV. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment; and

- V. A document demonstrating the preventative maintenance activity/activities recommended by the manufacturer(s) that are to be performed on each press.

### 3. Non-Applicability Determinations

- a. The presses are not subject to the New Source Performance Standards (NSPS) for Subpart QQ—Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR Part 60 Subpart QQ, because the presses are not publication rotogravure printing presses.
- b. The presses are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A , KK and OOOO , because the presses are not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses, and do not coat or print fabric or other textiles.
- c. The presses are not subject to 35 IAC 214.301 because due to the nature of the process there are no SO<sub>2</sub> emissions from the printing lines.
- d. Pursuant to 35 IAC 218.187(a)(2)(B)(ii), the lithographic presses are exempt from any requirements of 35 IAC 218.187, which includes 35 IAC 218.187(b),(c),(d),(e),(f), and (g) because the source is subject to the requirements of the Lithographic Printing regulations.
- e. Pursuant to 35 IAC 218.204(c)(3), the presses are not subject to the requirements of 35 IAC 218.204(c), Paper Coating, because 35 IAC 218.204(c) shall not apply to any owner or operator of any paper coating line on which lithographic printing is performed if the paper coating line complies with the applicable emissions limitations in 35 IAC Subpart H, Printing and Publishing.
- f. The Lithographic Printing Operation, which includes presses #2, #4 #5a, and #6, is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for PM or VOM, because the Lithographic Printing Operation, which includes presses #2, #4, #5a, and #6, does not use an add-on control device to achieve compliance with an emission limitation or standard.

### 4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

### 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

#### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), 4.1.2(c)(i), and 4.1.2(d)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

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- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

**4.2 Sheet-fed, Non-Heatset Offset Lithographic Printing Operation Press #3**

**1. Emission Units and Operations**

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Press #3	PM and VOM	1991	N/A	None	None

Note: Pursuant to Condition 1.1.1(c) of Construction Permit #11080050, Press #3 shall be shutdown after construction is completed on Press #7. Press #7 will physically take the place of Press #3. See Section 7.4 for the requirements of Press #7 once Press #7 begins operation.

**2. Applicable Requirements**

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act. In addition, Press #3 shall comply with the applicable requirements in Section 5.1.

**a. i. Opacity Requirements**

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

**ii. Compliance Method (Opacity Requirements)**

**Monitoring**

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each press or common stack in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the press, maintenance and repair and/ or adjustment of operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

**Recordkeeping**

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

**b. i. Particulate Matter Requirements (PM)**

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process

emission unit which, either alone or in combination with the emission of PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2)

ii. Compliance Method (PM Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:

- I. The hours of operation for Press #3, hr/mo and hr/yr.
- II. The emissions of PM from Press #3, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the hourly limits of 35 IAC 212.321.

c. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and with the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

B. Pursuant to 35 IAC 218.407(a)(3)(A), no owner or operator of lithographic printing lines shall cause or allow the operation of any sheet-fed offset lithographic printing line unless the VOM content of the as-applied fountain solution is 5 percent or less, by weight.

C. Pursuant to 35 IAC 218.407(a)(4), no owner or operator of lithographic printing lines shall cause or allow the use of a cleaning solution on any lithographic printing line unless:

- I. The VOM content of the as-used cleaning solution is less than or equal to 30 percent, by weight; or
- II. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F).

ii. Compliance Method (VOM Requirements)

Monitoring

A. Pursuant to 35 IAC 218.410(b)(2), the Permittee shall determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions to VOM up to a pre-set level. The equipment used to make automatic additions must be calibrated, operated and maintained in accordance with manufacturer specifications.

B. I. Pursuant to 35 IAC 218.410(e)(1), the owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with 35 IAC 218.407(a)(4)(A) must:

1. For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):

- i) Operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's

specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed; and

- ii) Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with 35 IAC 218.407(a)(4)(A);
- 2. For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) according to Condition 4.2.2(c)(ii)(G)(II).
- II. Pursuant to 35 IAC 218.410(e)(2), the owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with 35 IAC 218.407(a)(4)(B) must keep records for such cleaning solutions used on any such lines as set forth in Condition 4.2.2(c)(ii)(G)(III).

#### Testing

- C. Pursuant to 35 IAC 218.409(c), testing to demonstrate compliance with the applicable VOM content limitations under Conditions 4.2.2(c)(i)(B) and 4.2.2(c)(i)(C)(I) shall be conducted as follows:
  - I. On an annual basis, the VOM content of the fountain solution "as applied" shall be determined by Method 24 of 40 CFR 60, Appendix A.
  - II. On an annual basis, the VOM content of cleaning solvents shall be determined by Method 24 and Method 24A of 40 CFR 60, Appendix A.
  - III. The manufacturer's specifications for VOM content for fountain solution additives and cleaning solvents may be used if such manufacturer's specifications are based on the results of tests of VOM content conducted in accordance with Method 24 and/or Method 24A of 40 CFR 60, Appendix A, and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent.
- D. Pursuant to 35 IAC 218.409(e), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 IAC 218.110.
- E. If the Permittee intends to take credit for VOM containing waste shipped off-site, then the percent concentration of solvent in the VOM containing waste from the press shall be determined according to USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

#### Recordkeeping

- F. I. Pursuant to 35 IAC 218.411(e)(2)(A), the owner or operator 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 lines or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch.

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- II. Pursuant to 35 IAC 218.411(e)(2)(D), the Permittee shall collect and record the following for each automatic feed equipment setting:
1. VOM content limit corresponding to each setting;
  2. Date and time of initial setting and each subsequent setting; and
  3. Documentation of the periodic calibration of the automatic feed equipment in accordance with the manufacturer's specifications.
- G. Pursuant to 35 IAC 218.411(f)(2)(A-C), the owner or operator shall collect and record the following information for each cleaning solution used on each printing line:
- I. For each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 IAC 218.407(a)(4)(A) and that is prepared at the source with automatic equipment:
1. The name and identification of each cleaning solution;
  2. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 IAC 218.409(c);
  3. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
  4. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
  5. The VOM content of the as-used cleaning solution, with supporting calculations; and
  6. A calibration log for the automatic equipment, detailing periodic checks.
- II. For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 IAC 218.407(a)(4)(A) and which is not prepared at the source with automatic equipment:
1. The name and identification of each cleaning solution;
  2. Date and time of preparation, and each subsequent modification, of the batch;
  3. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 IAC 218.409(c);
  4. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
  5. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on

results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a).

- III. For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with 35 IAC 218.407(a)(4)(B):
1. The name and identification of each cleaning solution;
  2. Date and time of preparation, and each subsequent modification, of the batch;
  3. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with 35 IAC 218.409(e). For cleaning solutions that are used as purchased, the manufacture's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 IAC 218.105(a) and 218.110;
  4. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
  5. The VOM composite partial vapor pressure of each as-used cleaning solution in mmHg at 20°C (68°F). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 IAC 218.105(c) and 218.110.
- H. Pursuant to 39.5(7)(b) of the Act, the Permittee shall maintain the following records:
- I. The emissions of VOM from the press, tons/mo and ton/yr (12 month rolling average), with supporting calculations.
  - II. Hours of operation for the printing line (hr/month and hr/year).

d. i. Work Practice Requirements

- A. Pursuant to 35 IAC 218.407(a)(5), no owner or operator of lithographic printing lines shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored or disposed of in any manner other than in closed containers, except when specifically in use.
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate each press in a manner consistent with good air pollution control practice for minimizing emissions and the manufacturer(s) maintenance procedures, as specified.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform preventive maintenance on the press in accordance with the manufacturer recommendation(s).

- B. Pursuant to 35 IAC 218.411(f)(2)(D) and Sections 39.5(7)(a & d) of the Act, the Permittee shall perform monthly inspections of VOM-containing cleaning material containers to ensure that the work practice requirements of 35 IAC 218.407(a)(5) are performed.

Recordkeeping

- C. Pursuant to 35 IAC 218.411(f)(2)(D) and Section 39.5(7)(b) of the Act, the Permittee shall collect and record the following for each inspection performed, as required by Condition 4.2.2(d)(ii)(B), to ensure compliance with 35 IAC 218.407(a)(5):
- I. Date, time and duration of the inspections performed;
  - II. Name(s) of inspection personnel;
  - III. Identification of work practices being inspected;
  - IV. Any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any.
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of preventive maintenance performed, as required by Condition 4.2.2(d)(ii)(A), along with a maintenance and repair log. These records shall include, at a minimum:
- I. Date and time of the preventive maintenance activity;
  - II. Name(s) of personnel performing the preventative maintenance;
  - III. Identification of the press on which preventive maintenance is being performed;
  - IV. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment; and
  - V. A document demonstrating the preventative maintenance activity/activities recommended by the manufacturer that are to be performed on the press.\

**3. Non-Applicability Determinations**

- a. Press #3 is not subject to the New Source Performance Standards (NSPS) for Subpart QQ- Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR Part 60 Subpart QQ, because the press is not a publication rotogravure printing press.
- b. Press #3 is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A, KK and OOOO, because the press is not a publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing press, and is does not coat or print fabric or other textiles.
- c. Press #3 is not subject to 35 IAC 214.301 because due to the nature of the process there are no SO<sub>2</sub> emissions from the press.
- d. Pursuant to 35 IAC 218.187(a)(2)(B)(ii), the lithographic press is exempt from any requirements of 35 IAC 218.187, which includes 35 IAC 218.187(b), (c), (d), (e), (f), and (g) because the source is subject to the requirements of the Lithographic Printing regulations.

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- e. Pursuant to 35 IAC 218.204(c)(3), Press #3 is not subject to the requirements of 35 IAC 218.204(c), Paper Coating, because 35 IAC 218.204(c) shall not apply to any owner or operator of any paper coating line on which lithographic printing is performed if the paper coating line complies with the applicable emissions limitations in 35 IAC Subpart H, Printing and Publishing.
- f. Press #3 is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because Press #3 does not use an add-on control device to achieve compliance with an emission limitation or standard.

#### 4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

#### 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

##### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), and 4.2.2(d)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

4.3 Flexographic Printing Operation

**1. Emission Units and Operations**

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Press #8	VOM and PM	2003	N/A	None	None

**2. Applicable Requirements**

For the emission units in Condition 4.3.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act. In addition, Press #8 shall comply with the applicable requirements in Section 5.1.

**a. i. Opacity Requirements**

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

**ii. Compliance Method (Opacity Requirements)**

**Monitoring**

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each press or common stack in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the press, maintenance and repair and/ or adjustment of operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

**Recordkeeping**

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

**b. i. Particulate Matter Requirements (PM)**

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2).

ii. Compliance Method (PM Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:
  - I. The hours of operation for the printing press, hr/mo and hr/yr.
  - II. The emissions of PM from the printing press, lb/mo and ton/yr (12 month rolling average), with supporting calculations.

c. i. Volatile Organic Material Requirements (VOM)

- A. Pursuant to 35 IAC 218.401(a)(2), no owner or operator of a flexographic printing line that does not print flexible packaging shall apply at any time any coating or ink unless the VOM content does not exceed the following limitations:
  - I. Forty percent VOM by volume of the coating and ink (minus water and any compounds that are specifically exempted from the definition of VOM); or
  - II. Twenty-five percent VOM by volume of the volatile content in the coating and ink.
- B. Pursuant to 35 IAC 218.187(b), no owner or operator shall perform any cleaning operation unless the owner or operator meets the following requirements:
  - I. The VOM content of the as-used cleaning solutions, for flexographic printing that does not print flexible packaging, shall not exceed 0.10 kg/l or 0.83 lb/gal; or
  - II. The VOM composite vapor pressure of each as-used cleaning solution used shall not exceed 8.0 mmHg measured at 20°C (68°F).

ii. Compliance Method (VOM Requirements)

Testing

- A. Pursuant to 35 IAC 218.401(a), 35 IAC 218.404(a), and 35 IAC 218.105(a), on an annual basis, the VOM content of specific inks or coatings used on the affected unit shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a), as follows:
  - I. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used; provided, however, Method 24, incorporated by reference at 35 IAC 218.112, shall be used to demonstrate compliance; or
  - II. The manufacturer's specifications for VOM content for inks or coatings may be used if such manufacturer's specifications are based on 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.
- B. Pursuant to 35 IAC 218.187(g)(2), on an annual basis, testing to demonstrate compliance with the VOM content limitations in 35 IAC 218.187(b)(1), and to

determine the VOM content of cleaning solvents and cleaning solutions, shall be conducted as follows:

- I. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used, provided; however, Method 24, incorporated by reference in 35 IAC 218.112, shall be used to demonstrate compliance; or
  - II. The manufacturer's specifications for VOM content for cleaning solvents may be used if such manufacturer's specifications are based on 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. In the event of any inconsistency between a Method 24 test and the manufacturer's specifications, the Method 24 test shall govern.
- C. Pursuant to 35 IAC 218.187(g)(3), on an annual basis, testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 IAC 218.110. The manufacturer's specifications for VOM composite vapor pressure for cleaning solvents that are used as purchased may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 IAC 218.105(c) and 35 IAC 218.110.
- D. If the Permittee intends to take credit for VOM containing waste shipped off-site, then the percent concentration of solvent in the VOM containing waste from the press shall be determined according to USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

Recordkeeping

- E. Pursuant to 35 IAC 218.404(c)(2), the Permittee shall collect and record all of the following information each day for each coating line:
- I. The name and identification number of each coating and ink as applied on the printing line.
  - II. The VOM content of each coating and ink as applied each day on the printing line.
- F. For each cleaning solution complying with the VOM content limitations of Condition 4.3.2(c)(i)(B)(I), the Permittee shall collect and record the following information pursuant to 35 IAC 218.187(e)(3):
- I. For each cleaning solution that is prepared at the source with automatic equipment:
    - 1. The name and identification of each cleaning solution;
    - 2. The VOM content of each cleaning solvent in the cleaning solution;
    - 3. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);

4. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
  5. The VOM content of the as-used cleaning solution, with supporting calculations; and
  6. A calibration log for the automatic equipment, detailing periodic checks.
- II. For each batch of cleaning solution that is not prepared at the source with automatic equipment:
1. The name and identification of each cleaning solution;
  2. Date, time of preparation, and each subsequent modification of the batch;
  3. The VOM content of each cleaning solvent in the cleaning solution;
  4. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
  5. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are not prepared at the site but are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a).
- G. For each cleaning solution complying with the VOM composite partial pressure limitations of Condition 4.3.2(c)(i)(B)(II), the Permittee shall collect and record the following information pursuant to 35 IAC 218.187(e)(4):
- I. The name and identification of each cleaning solution;
  - II. Date, 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 the applicable methods and procedures specified in 35 IAC 218.110;
  - IV. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
  - V. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with the applicable methods and procedures specified in 35 IAC 218.110.
- H. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records for Press #8:
- I. The emissions of VOM, tons/mo and ton/yr (12 month rolling average), with supporting calculations.
  - II. Results of VOM content testing for VOM containing waste, if applicable.

d. i. Work Practice Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the press in a manner consistent with good air pollution control practice for minimizing emissions.
- B. Pursuant to 35 IAC 218.187(d), the owner or operator shall comply with the following for the cleaning operations associated with the flexographic printer:
  - I. Cover open containers and properly cover and store applicators used to apply cleaning solvents;
  - II. Minimize air circulation around the cleaning operation;
  - III. Dispose of all used cleaning solutions, cleaning towels, and applicators used to apply cleaning solvents in closed containers;
  - IV. Utilize equipment practices that minimize emissions;
  - V. When using cleaning solvent for wipe cleaning, sources that manufacture coatings, inks, adhesives, or resins shall:
    - 1. Cover open containers used for the storage of spent or fresh organic compounds used for cleanup or coating, ink, adhesive, or resin removal; and
    - 2. Cover open containers used for the storage or disposal of cloth or paper impregnated with organic compounds that are used for cleanup or coating, ink, adhesive, or resin removal.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform preventive maintenance on the press in accordance with the manufacturer recommendation(s).
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform monthly inspections of the cleaning operations associated with the flexographic printer to ensure that the work practice requirements listed in Condition 4.3.2(d)(i)(B) are performed.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed, as required by Condition 4.3.2(d)(ii)(B). These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, and findings of the inspection (specifically noting compliance with the work practice requirements of Condition 4.3.2(d)(i)(B)).
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of preventive maintenance performed, as required by Condition 4.3.2(d)(ii)(A), along with a maintenance and repair log. These records shall include, at a minimum: date and time of the preventive maintenance activity, name(s) of personnel performing the preventive maintenance, identification of the press on which preventive maintenance is being performed, a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of

the piece of equipment, and a document demonstrating the preventative maintenance activity/activities recommended by the manufacturer that are to be performed on the press.

### 3. Non-Applicability Determinations

- a. Press #8 is not subject to the New Source Performance Standards (NSPS) for Subpart QQ- Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR Part 60 Subpart QQ, because the press is not a publication rotogravure printing press.
- b. The Flexographic Printing Operation (Press #8) is not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for the Printing and Publishing Industry, 40 CFR Part 63 Subpart KK, because the Flexographic Printing Operation (Press #8) is not located at a major source of HAPs, as defined by 40 CFR 63.2.
- c. Pursuant to 35 IAC 218.204(c)(3), the press is not subject to the requirements of 35 IAC 218.204(c), Paper Coating, because 35 IAC 218.204(c) shall not apply to any owner or operator of any paper coating line on which flexographic printing is performed if the paper coating line complies with the applicable emissions limitations in 35 IAC Subpart H, Printing and Publishing.
- d. Pursuant to 35 IAC 218.402(c), a flexographic printing line (Press #8) complying by means of 35 IAC 218 Subpart H is not required to meet 35 IAC Subpart G, 35 IAC 218.301 or 218.302.
- e. The Flexographic Printing Operation (Press #8) is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the Flexographic Printing Operation (Press #8) does not use an add-on control device to achieve compliance with an emission limitation or standard.

### 4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

### 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

#### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.3.2(a)(i), 4.3.2(b)(i), 4.3.2(c)(i), and 4.3.2(d)(i).
  - B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:

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- A. Date and time of the deviation.
- B. Emission unit(s) and/or operation involved.
- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

4.4 Finishing Department

**1. Emission Units and Operations**

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Gluer Line #47	PM and VOM	Post-1972	N/A	None	None
Gluer Line #48					
Gluer Line #50					
Gluer Line #51					
Gluer Line #52					
Gluer Line #54					
Gluer Line #56					
Gluer Line #59					
Gluer Line #60					

Note: The Finishing Department also consists of equipment such as; cutters, shredders, scrap collectors, and paper baling. These emission units are "insignificant activities" and are listed in Section 6.2 of this Permit.

**2. Applicable Requirements**

For the emission units in Condition 4.4.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit or common stack in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair and/ or adjustment of operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any

corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

**b. i. Particulate Matter Requirements (PM)**

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2).

**ii. Compliance Method (PM Requirements)**

Recordkeeping

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:

- I. The hours of operation for each gluing machine, hr/mo and hr/yr.
- II. The emissions of PM from each gluing machine, lb/mo and ton/yr (12 month rolling average), with supporting calculations.

**c. i. Volatile Organic Material Requirements (VOM)**

A. Pursuant to 35 IAC 218.204(c), no owner or operator of a paper coating line shall apply at any time any coating (e.g., glue) in which the VOM content exceeds the emission limitations, as follows:

<u>kg VOM/kg (lb VOM/lb) solids applied</u>	<u>kg VOM/kg (lb VOM/lb) coatings applied</u>
0.40	0.08

**ii. Compliance Method (VOM Requirements)**

Testing

A. Pursuant to 35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act, testing for VOM content of coatings and cleanup solvents shall be performed as follows:

- I. On an annual basis, the VOM content of coatings "as applied" by the coating lines (e.g., the gluing machines) shall be determined according to Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
- II. The VOM content of the cleaning solvents used on each affected coating line shall be tested upon request of the Agency according to Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a), 218.208, and 218.211(a).
- III. The manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on the results of tests of VOM content conducted and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent [35 IAC 218.105(a)]. The testing performed by

the supplier must certify that the appropriate test methods were followed in accordance with Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC Part 218, as applicable.

Recordkeeping

- B. Pursuant to 35 IAC 218.211(a), the Permittee shall maintain records associated with the testing procedures required by Condition 4.4.2(c)(ii). These records shall consist of the following:
  - I. Pursuant to 35 IAC 218.211(c)(2), for the coating lines, the owner or operator shall collect and record all of the following information each day:
    - 1. The name and identification number of each coating as applied on each coating line;
    - 2. The weight of VOM per volume of each coating (minus water and any compounds that are specifically exempted from the definition of VOM) as applied each day on each coating line; and
    - 3. The weight of VOM per weight of solids (or the weight of VOM per weight of coatings, as applicable) in each coating as applied each day on each coating line, and certified product data sheets for each coating.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records:
  - I. The usage of each coating (e.g., glue) and cleanup solvent, in units of gallons/month and gallons/year;
  - II. VOM content of each cleanup solvent used in lbs/gal; and
  - III. Total monthly and annual VOM emissions from coatings and cleanup solvents (ton/mo and ton/yr).

d. i. Work Practice Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate each gluing machine in a manner consistent with good air pollution control practice for minimizing emissions.
- B. Pursuant to 35 IAC 218.218(a), the Permittee shall:
  - I. Store all VOM-containing cleaning materials in closed containers;
  - II. Ensure that mixing and storage containers used for VOM-containing materials are kept closed at all times except when depositing or removing those materials;
  - III. Minimize spills of VOM-containing cleaning materials;
  - IV. Convey VOM-containing cleaning materials from one location to another in closed containers or pipes; and
  - V. Minimize VOM emissions from the cleaning of storage, mixing, and conveying equipment.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform preventive maintenance on each gluer in accordance with the manufacturer(s) recommendation(s).
- B. Pursuant to Sections 39.5(7)(a) of the Act, the Permittee shall perform monthly inspections of the cleaning operations associated with the gluers to ensure that the work practice requirements listed in Condition 4.4.2(d)(1)(B) are performed.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed, as required by Condition 4.4.2(d)(ii)(B). These records shall include, at a minimum:
  - I. Date and time inspections were performed;
  - II. Name(s) of inspection personnel;
  - III. Identification of equipment being inspected;
  - IV. Findings of the inspections (specifically noting compliance with the work practice requirements of Condition 4.4.2(d)(i)(B)).
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of preventive maintenance performed, as required by Condition 4.4.2(d)(ii)(A), along with a maintenance and repair log. These records shall include, at a minimum: date and time of the preventive maintenance activity, name(s) of personnel performing the work, identification of the gluer on which preventive maintenance is being performed, a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment, and a document demonstrating the preventative maintenance activity/activities recommended by the manufacturer(s) that are to be performed on each gluer.

**3. Non-Applicability Determinations**

- a. For the gluing machines, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material, no owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC Subpart G (35 IAC 218.301 or 218.302).
- b. Pursuant to 35 IAC 218.187(a)(2)(B)(vii), the gluing machines are exempt from any requirements of 35 IAC 218.187, which includes 35 IAC 218.187(b),(c),(d),(e),(f), and (g) because the gluers perform "paper coating".
- c. The gluing machines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the gluing machines do not use an add-on control device to achieve compliance with an emission limitation or standard.

**4. Other Requirements**

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

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**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

**a. Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.4.2(a)(i), 4.4.2(b)(i), 4.4.2(c)(i), and 4.4.2(d)(i).
  - B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

4.5 Natural Gas-Fired Boilers

**1. Emission Units and Operations**

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Boiler #1 (16.74 mmBtu/hr)	PM and CO	1962	N/A	None	None
Boiler #2 (16.74 mmBtu/hr)	PM and CO	1962	N/A	None	None

**2. Applicable Requirements**

For the emission units in Condition 4.5.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

**a. i. Opacity Requirements**

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

**ii. Compliance Method (Opacity Requirements)**

**Monitoring**

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the boilers in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the boiler, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

**Recordkeeping**

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, if required, the Permittee shall keep records for all opacity measurements made in accordance with Method 9.

**b. i. Carbon Monoxide Requirements (CO)**

A. Pursuant to 35 IAC 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.

- ii. Compliance Method (CO Requirements)
  - A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of CO emissions from the boilers, including supporting calculations (pounds/hour).
  - B. The periodic monitoring required by the operational and production requirements in Condition 4.5.2(c) and the work practice requirement in Condition 4.5.2(d) also address monitoring required to meet 39.5(7)(f) of the Act.

c. i. Operational and Production Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, when the boilers are fired using natural gas, only pipeline quality natural gas shall be used.
- B. Pursuant to Permit #95090022, in the event of a natural gas outage, disruption or curtailment, the Permittee is authorized to use propane as a substitute fuel. [T1]

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b), the Permittee shall maintain records of the following:
  - I. The type of fuel fired in the boilers; and
  - II. The total natural gas consumption (mmscf/month or therms/month and mmscf/yr or therms/yr) for the boilers.
  - III. Any periods which a natural gas outage, disruption or curtailment occurred that resulted in propane being fired as a substitute fuel for the boilers.

d. i. Work Practice Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the boilers in a manner consistent with good air pollution control practice for minimizing emissions. For this purpose, the Permittee shall conduct boiler tune-ups at least once every 5 years, in accordance with the following:
  - I. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may delay the burner inspection until the next scheduled unit shutdown, but each burner shall be inspected at least once every 72 months).
  - II. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
  - III. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
  - IV. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.

- V. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of the boilers and associated auxiliary equipment.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records associated with each boiler tune-up conducted:
  - I. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up;
  - II. A description of any corrective actions taken as a part of the combustion adjustment; and
  - III. The type and amount of fuel used over the 60 months prior to the 5 year adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

**3. Non-Applicability Determinations**

- a. Pursuant to 40 CFR 60.40c(a), the boilers are not subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating, 40 CFR Part 60 Subpart Dc, because the boilers have not been constructed, modified, or reconstructed after June 9, 1989.
- b. The boilers are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR Part 63 Subpart JJJJJJ, because the boilers are not subject to that subpart as the affected boilers are considered gas-fired boilers, pursuant to 40 CFR 63.11195(e), as defined in 40 CFR 63.11237: gas-fired boilers includes any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.
- c. The boilers are not subject to 35 IAC 212.322, because the boilers are not by definition process emission units.

- d. The boilers are not subject to 35 IAC 214.301, because the boilers are not by definition process emission units.
- e. The boilers are not subject to 35 IAC 217.141, because the boilers do not have an actual heat input equal to or greater than 250 mmBtu/hr.
- f. The boilers are not subject to the requirements of 35 IAC 218.301 and 302, Use of Organic Material, because, pursuant to 35 IAC 218.303, these regulations shall not apply to fuel combustion emission sources.
- g. The boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.

#### **4. Other Requirements**

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

#### **5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

##### **a. Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.5.2(a)(i), 4.5.2(b)(i), 4.5.2(c)(i), and 4.5.2(d)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

**Section 5 - Additional Title I Requirements**

**1. Construction Permits**

**a. Construction Permit #01080015 [T1]**

i. Emission Units and Operations

<i>Section</i>	<i>Emission Units</i>	<i>Pollutants Being Regulated</i>
4.1	Lithographic Presses #2, #4, and #5a	VOM
4.2	Lithographic Press #3	VOM
4.3	Flexographic Press #8	VOM

ii. Applicable Requirements

In addition to the requirements in Section 4 of this permit for the emission units in Condition 5.1(a)(i) above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

- A. I. Pursuant to Condition 1.6(b) of Construction Permit #01080015, total VOM emissions from lithographic printing presses #2, #3, #4, and #5a combined shall not exceed 15.0 tons/month and 74.5 tons/year.
- II. Pursuant to Condition 1.6(a) of Construction Permit #01080015, total VOM emissions from lithographic printing presses #2, #5a, and flexographic printing press #8 combined shall not exceed 10 tons/month and 39.5 tons/year.

Compliance Method

- III. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records on a per line basis for presses #2, #3, #5a, #4, and #8:
  - 1. The usage of ink, coating, fountain solution, cleaning solution and any other VOM containing materials used in pounds or tons on a monthly basis.
  - 2. Hours of operation (hours/month and hours/year).
  - 3. VOM emissions (tons/month and tons/year) with supporting calculations.

Note: The applicable requirements for VOM (e.g., VOM content of materials, etc.) from Sections 4.1, 4.2, and 4.3 also help to demonstrate compliance with Conditions 5.1(a)(ii)(A)(I & II).

**b. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

i. Prompt Reporting

- A. I. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different

period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

Requirements in Conditions 5.1(a)(ii)(A).

- II. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- B. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.5(b).
- C. The deviation reports shall contain at a minimum the following information:
  - I. Date and time of the deviation.
  - II. Emission unit(s) and/or operation involved.
  - III. The duration of the event.
  - IV. Probable cause of the deviation.
  - V. Corrective actions or preventative measures taken.

**2. Construction Permits - (Equipment Not Yet Built)**

The Permittee shall comply with all applicable requirements of Condition 7.4 for all appropriate emission unit(s) identified in Condition 7.4 pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act. The Permittee shall certify compliance with the applicable requirements of Condition 7.4 as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new requirements in accordance to Condition 2.9 when the equipment is constructed.

## Section 6 - Insignificant Activities Requirements

### 1. Insignificant Activities Subject to Specific Regulations

Pursuant to 35 IAC 201.210 and 201.211, the following activities at the source constitute insignificant activities. Pursuant to Sections 9.1(d) and 39.5(6)(a) of the Act, the insignificant activities are subject to specific standards promulgated pursuant to Sections 111, 112, 165, or 173 of the Clean Air Act. The Permittee shall comply with the following applicable requirements:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Gas turbines and stationary reciprocating internal combustion engines < 112 kW (150 HP).	1	35 IAC 201.210(a)(15)

#### a. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements in addition to the applicable requirements in Condition 6.4:

#### i. National Emission Standards for Hazardous Air Pollutants (NESHAP)-engine

- A. Pursuant to 40 CFR 63.6603, the owner or operator must comply with the requirements in Table 2d (4) of Subpart ZZZZ.
- B. Pursuant to 40 CFR 63.6625(e), (f), (h), and (i), the owner or operator must comply with the monitoring, operating and maintenance requirements.
- C. Pursuant to 40 CFR 63.6605 and 40 CFR 63.6640, the owner or operator must meet compliance and reporting requirements.
- D. Pursuant to 40 CFR 63.6595(a), compliance must be met no later than October 19, 2013.

### 2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Ink Mixers	2	35 IAC 201.210(a)(1) and 201.211
Plate Room	1	35 IAC 201.210(a)(1) and 201.211
Coating Storage Tank	1	35 IAC 201.210(a)(1) and 201.211
Aerators	2	35 IAC 201.210(a)(2) or (a)(3)
Sheeters (cutters)	3	35 IAC 201.210(a)(2) or (a)(3)
Scrap System	1	35 IAC 201.210(a)(2) or (a)(3)
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).	1	35 IAC 201.210(a)(4)

### 3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

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#### 4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 (see Conditions 7.2(a)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.
- c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.
- d. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.
- e. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 218.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

#### 5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed.
- b. Potential to emit emission calculations before any air pollution control device for each insignificant activity.

#### 6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

##### a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. A construction

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permit is not required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):

- A. A description of the emission unit including the function and expected operating schedule of the unit.
  - B. A description of any air pollution control equipment or control measures associated with the emission unit.
  - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
  - D. The means by which emissions were determined or estimated.
  - E. The estimated number of such emission units at the source.
  - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. A construction permit is not required. Addresses are included in Attachment 3.
- iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any change made in Condition 6.6(a) above.

**b. Notification Required at Renewal**

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit. A construction permit is not required.

**c. Notification Not Required**

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required. A construction permit is not required.

## Section 7 - Other Requirements

### 1. Testing

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
  - i. The name and identification of the emission unit(s) being tested.
  - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
  - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
  - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.
  - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
  - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
  - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
  - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
  - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:
  - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
  - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.
- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but

no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:

- i. General information including emission unit(s) tested.
  - ii. A summary of results.
  - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
  - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
  - v. Detailed description of test conditions, including:
    - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
    - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
    - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
  - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
  - vii. An explanation of any discrepancies among individual tests or anomalous data.
  - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
  - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
  - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

<b>2. PM Process Weight Rate Requirements</b>
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**a. New Process Emission Units - 35 IAC 212.321**

New Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972. [35 IAC 212.321]

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation: [35 IAC 212.321(b)]

$$E = A(P)^B$$

Where:

P = Process weight rate (T/hr)  
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54  
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8  
B = 0.16

iii. Limits for New Process Emission Units [35 IAC 212.321(c)]:

<u>P</u> (T/hr)	<u>E</u> (lbs/hr)	<u>P</u> (T/hr)	<u>E</u> (lbs/hr)
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

**3. Emissions Reduction Market System (ERMS) Requirements**

- a. Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS.
- b. Obligation to Hold Allotment Trading Units (ATUs)
- i. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 7.3(g), as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of 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 7.3(d):
- A. VOM emissions from insignificant emission units and activities as identified in Section 6 of this permit, in accordance with 35 IAC 205.220.
- B. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 4 of this permit, in accordance with 35 IAC 205.225.
- C. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).
- D. Excess VOM emissions that are a consequence of an emergency as approved by the IEPA, pursuant to 35 IAC 205.750.
- E. VOM emissions from certain new and modified emission units as addressed by Condition 7.3(g)(ii), if applicable, in accordance with 35 IAC 205.320(f).
- ii. In accordance with 35 IAC 205.150(c)(2), notwithstanding the Condition 7.3(b)(i) above, 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 seasonal 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 4 of this permit.
- c. Market Transactions
- i. As specified in 35 IAC 205.610(a), the source shall apply to the IEPA for and obtain authorization for a Transaction Account prior to conducting any market transactions.
- ii. Pursuant to 35 IAC 205.610(b), the Permittee shall promptly submit to the IEPA any revisions to the information submitted for its Transaction Account.
- iii. Pursuant to 35 IAC 205.620(a), the source shall have at least one account officer designated for its Transaction Account.
- iv. 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 IEPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the IEPA for entry into the Transaction Account database.
- d. Emissions Excursion Compensation
- Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 7.3(b), it shall provide emissions excursion compensation in accordance with the following:

- i. Upon receipt of an Excursion Compensation Notice issued by the IEPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
  - A. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
  - B. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- ii. If requested in accordance with paragraph 7.3(d)(iii) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the IEPA 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.
- iii. Pursuant to 35 IAC 205.720(c), within 15 days after 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 IEPA, rather than purchased from the ACMA.

e. Quantification of Seasonal VOM Emissions

- i. Pursuant to 35 IAC 205.315(b), the methods and procedures specified in Sections 3 and 4 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:

No exceptions
- ii. In accordance with 35 IAC 205.750, the Permittee shall report emergency conditions at the source to the IEPA 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 205.750(a), and shall be submitted in accordance with the following:
  - A. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency.
  - B. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

f. Annual Account Reporting

- i. Pursuant to 35 IAC 205.300, for each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the IEPA for the seasonal allotment period. This report shall include the following information:
  - A. Actual seasonal emissions of VOM from the source.
  - B. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations.
  - C. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337.

- D. 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 IEPA.
  - E. 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).
  - F. If a source is operating a new or modified emission unit for which three years of operational data is 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.
- ii. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

g. Allotment of ATUs to the Source

- i.
  - A. The allotment of ATUs to this source is 1,431 ATUs per seasonal allotment period.
  - B. This allotment of ATUs reflects the IEPA's determination that the source's baseline emissions were 162.546 tons per season.
  - C. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 7.3(i) of this permit.
  - D. ATUs will be issued to the source's Transaction Account by the IEPA 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.
- ii. Contingent Allotments for New or Modified Emission Units

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units:

<i>Emission Unit</i>	<i>Construction Permit No.</i>	<i>Date Issued</i>
Gluing Machine 47	11120015	2012
Lithographic Printing Press #6 & #7 (Note: Press # 7 is not yet constructed as of the date of issuance of this Permit.)	11080050	2013
Gluing Machine	09050056	2009
Gluing Machine	08080035	2008
Lithographic Printing Press #5A Flexographic Printing Unit #8	01080015	2003
Lithographic Printing Press #2	99030028	1999

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

- iii. 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:

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- A. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630.
- B. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720.
- C. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

h. Recordkeeping for ERMS

Pursuant to 35 IAC 205.700(a), the Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS:

- i. Seasonal component of the Annual Emissions Report.
- ii. Information on actual VOM emissions, as specified in detail in Sections 3 and 4 of this permit and Condition 7.3(e)(i).
- iii. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

i. Exclusions from Further Reductions

- i. A. Pursuant to 35 IAC 205.405(a), VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following:
  - I. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA.
  - II. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines.
  - III. An emission unit for which a LAER demonstration has been approved by the IEPA on or after November 15, 1990.
- B. Pursuant to 35 IAC 205.405(a) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above:

None
- ii. A. Pursuant to 35 IAC 205.405(b), VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT.
- B. Pursuant to 35 IAC 205.405(b) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above:

None



Emission Unit	Description	Emission Control Equipment
Press #7	Sheet-fed offset lithographic printing press with flexographic coating unit.	None

1.1.3 Applicable Provisions and Emission Standards

- a. i. An "affected printing line" for the purpose of these unit-specific conditions is an offset lithographic printing operation described in Conditions 1.1.1 and 1.1.2.
- ii. The affected printing lines are subject to the following:
  - A. The volatile organic material (VOM) content of the as-applied fountain solution shall be 5 percent or less, by weight. [35 IAC 218.407(a)(3)(A)]
  - B. The cleaning solution shall meet one of the following requirements.
    - 1. The VOM content of the as-used cleaning solution is less than or equal to 30 percent, by weight; or [35 IAC 218.407(a)(4)(A)(i)]
    - 2. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F). [35 IAC 218.407(a)(4)(B)]
  - C. The VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line shall be kept, stored and disposed of only in closed containers, except when specifically in use. [35 IAC 218.407(a)(5)]
- b. An "affected coating line" for the purpose of these unit-specific conditions, is a flexographic coating operation described in Conditions 1.1.1 and 1.1.2.
- c. i. An "affected unit" is the combination of affected printing line and affected coating line on an individual press.
- ii. The Permittee shall not cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from each affected unit. If no odor nuisance exists the limitation shall apply only to photochemically reactive material as defined in 35 IAC 211.4690. [35 IAC 218.301]

1.1.4 Non-Applicability Provisions

- a. This permit is issued based on the affected coating lines not subject to the paper coating limitation in 35 IAC 218.204(c) because the lines are required to comply with the applicable emissions limits in 35 IAC Part 218 Subpart H. [35 IAC 218.204(c)(3)]
- b. i. This permit is issued based on this project not being a major modification for purposes of the state rules for Major Stationary Sources Construction and Modification (MSSCAM), 35 IAC Part 203. This is because this project will not result in a significant net increase in emissions of VOM. (See also Table 1 at the end of this permit.)
- ii. A. This permit is issued based upon the permanent shutdown of Lithographic Press #3, except as allowed by Condition 1.1.5(a)(ii)(B), and Rotogravure Press #9. Once a press is permanently shut down, any future operation of this equipment is prohibited unless the Permittee obtains a construction permit addressing the resumption of operation of that equipment and an appropriately revised version of this construction permit.
- B. Rotogravure Press #9 shall permanently cease operation effective October 10, 2011, the date this permit was originally issued.

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- C. Sheet-fed offset Lithographic Press #3 shall permanently cease operation no later than 180 days after initial operation of Press #7.
- c. The affected units are not subject to 35 IAC 218.187: Other Industrial Solvent Cleaning Operations, except for the recordkeeping and reporting requirements in 35 IAC 218.187(e). [35 IAC 218.187(a)(2)(B)]
- d. This permit is issued based on the source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK because the source is not a major source of hazardous air pollutants (HAPs).

Note: The source's CAAPP permit contains provisions limiting HAP emissions (See Condition 5.6.2 of the source's CAAPP permit, Permit Number 95090022) as well as other requirements to verify minor source status for HAP emissions, which will continue to apply to the source. Accordingly, the addition of the affected units will not change the minor source status of the source.

1.1.5 Production and Emission Limits

- a.
  - i. VOM usage shall not exceed 4 tons/month and 20 tons/year for coatings and 2.6 tons/month and 13 tons/year for wash materials used on the affected units.
  - ii.
    - A. Emissions of VOM from the affected units shall not exceed 8.32 tons/month and 41.6 tons/year.
    - B. Notwithstanding the above, until Press #3 has been permanently shutdown, emissions of VOM from the affected units shall not exceed 7.0 tons/month and 35.2 tons/year.
  - iii. Compliance with the annual limits shall be determined from a running total of 12 months of data.
- b. This permit is issued based on the addition of the affected units in combination with the existing emission units at the source not affecting the source's status as a minor source for emissions of HAPs. The source's Clean Air Act Permit Program (CAAPP) permit (Permit No. 95090022) contains provisions limiting source-wide HAP emissions to less than 10 tons of any individual HAP and less than 25 tons total (See Condition 5.6.2 of the source's CAAPP). The CAAPP permit also imposes recordkeeping requirements to verify minor source status for HAPs.

1.1.6 Testing Requirements

- a. For the affected printing lines:
  - i. Testing to demonstrate compliance with the requirements of 35 IAC 218.407 shall be conducted by the Permittee within 90 days after a request by the Illinois EPA. Such testing shall be conducted at the expense of the Permittee and the Permittee shall notify the Illinois EPA in writing 30 days in advance of conducting such testing to allow the Illinois EPA to be present during such testing. [35 IAC 218.409(a)]
  - ii. Testing to demonstrate compliance with the VOM content limitations in 35 IAC 218.407(a)(1)(A), (a)(2), (a)(3) and (a)(4)(A), and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of 35 IAC 218.411(a)(1)(B), (b)(1)(B), or (b)(2)(B) as applicable), shall be conducted upon request of the Illinois EPA, as follows: [35 IAC 218.409(c)]

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- A. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used; provided, however, Method 24, incorporated by reference at 35 IAC 218.112, shall be used to demonstrate compliance; or
  - B. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, and inks may be used if such manufacturer's specifications are based on 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.
- iii. Testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 IAC 218.110. [35 IAC 218.409(e)]
- b. For the affected coating lines, the VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105.

1.1.7 Monitoring Requirements

The Permittee shall conduct the following monitoring for the affected printing line:

- a. Fountain Solution VOM Content.
  - i. For a fountain solution to which VOM is not added automatically, the Permittee shall maintain records of the VOM content of the fountain solution in accordance with 35 IAC 218.411(e)(2)(C). [35 IAC 218.410(b)(1)(A)]
  - ii. For fountain solutions to which VOM is added at the source with automatic feed equipment, 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. The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications. [35 IAC 218.410(b)(2)]
- b. Cleaning Solution.
  - i. If the Permittee is relying on the VOM content of the cleaning solution to comply with 35 IAC 218.407(a)(4)(A): [35 IAC 218.410(e)(1)]
    - A. For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):
      - 1. Install, operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed; and
      - 2. Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with 35 IAC 218.407(a)(4)(A);
    - B. For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) as set forth in 35 IAC 218.411(f)(2).
  - ii. If the Permittee is relying on the vapor pressure of the cleaning solution to comply with 35 IAC 218.407(a)(4)(B), keep records for such cleaning solutions used on any such line(s) as set forth in 35 IAC 218.411(f)(2)(C). [35 IAC 218.410(e)(2)]

1.1.8 Recordkeeping Requirements

The Permittee shall maintain records of the following items:

- a. For the affected printing lines:
- i. Collect and record the following information for each fountain solution: [35 IAC 218.411(e)(2)]
- A. 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.
  - B. If the VOM content of the fountain solution is determined pursuant to 35 IAC 218.410(b)(1)(A), for each batch of as-applied fountain solution:
    - 1. Date and time of preparation and each subsequent modification of the batch.
    - 2. Volume or weight, as applicable, and VOM content of each component used in, or subsequently added to, the fountain solution batch.
    - 3. Calculated VOM content of the as-applied fountain solution.
  - C. If the VOM content of the fountain solution is determined pursuant to 35 IAC 218.410(b)(2), for each setting:
    - 1. VOM content limit corresponding to each setting.
    - 2. Date and time of initial setting and each subsequent setting.
    - 3. Documentation of the periodic calibration of the automatic feed equipment in accordance with the manufacturer's specifications.
- ii. Collect and record the following information for each cleaning solution: [35 IAC 218.411(f)(2)]
- A. For each cleaning solution for which the Permittee relies on the VOM content to demonstrate compliance with 35 IAC 218.407(a)(4)(A) and which is prepared at the source with automatic equipment:
    - 1. The name and identification of each cleaning solution.
    - 2. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 IAC 218.409(c).
    - 3. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM).
    - 4. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution.
    - 5. The VOM content of the as-used cleaning solution, with supporting calculations.
    - 6. A calibration log for the automatic equipment, detailing periodic checks.

- B. For each batch of cleaning solution for which the Permittee relies on the VOM content to demonstrate compliance with 35 IAC 218.407(a)(4)(A), and which is not prepared at the source with automatic equipment:
1. The name and identification of each cleaning solution.
  2. Date and time of preparation, and each subsequent modification, of the batch.
  3. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 IAC 218.409(c).
  4. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution.
  5. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a).
- C. For each batch of cleaning solution for which the Permittee relies on the vapor pressure of the cleaning solution to demonstrate compliance with 35 IAC 218.407(a)(4)(B):
1. The name and identification of each cleaning solution.
  2. Date and time of preparation, and each subsequent modification, of the batch.
  3. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with 35 IAC 218.409(e). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 IAC 218.105(a) and 218.110.
  4. The total amount of each cleaning solvent used to prepare the as-used cleaning solution.
  5. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with 35 IAC 218.409(e). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 IAC 218.105(a) and 218.110.
- D. 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.
- b. For the affected units:
- i. VOM and HAP usage for each raw material used (tons/month and tons/year) with supporting documentation.

- ii. Amount of cleanup solution reclaimed for reuse or sent offsite for disposal and VOM content of the waste.
- iii. VOM and HAP emissions (tons/month and tons/year), with supporting calculations.

1.1.9 Reporting Requirements

- a. For the affected printing line, the Permittee shall:
  - i. Upon initial startup of an affected printing line, the Permittee shall provide the certifications identified in 35 IAC 218.411(e)(1) and (f)(1) to the Illinois EPA, Compliance Section.
  - ii. Notify the Illinois EPA in writing of any violation of 35 IAC 218.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation. [35 IAC 218.411(e)(3) and 35 IAC 218.411(f)(3)]
- b. Upon initial startup of the affected units, the Permittee shall submit a certification to the Illinois EPA that includes a description of each cleaning operation exempt pursuant to 35 IAC 218.187(a)(2), if any, and a listing of the emission units on which the exempt cleaning operation is performed. (35 IAC 218.187(e)(2)(A))
- c. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA of deviations of an affected unit with the permit requirements as follows unless otherwise specified by the CAAPP permit for the source. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

  - i. Operation or emissions from the affected unit in excess of the limits specified in Condition 1.1.5 within 30 days of such occurrence.
  - ii. Notifications for other deviations in a quarterly report.
- d. Within 30 days of occurrence, the Permittee shall notify the Illinois EPA of the date that Press #3 was permanently shutdown.

1.1.10 Authorization to Operate

The affected units may be operated under this permit until renewal of the source's CAAPP permit provided the source has submitted a complete and timely CAAPP renewal application. This condition supersedes Standard Condition 6.

It should be noted that the new sheeter is exempt from state permit requirements pursuant to 35 IAC 201.146(aa). It should also be noted that the two new cutters (a modification to the pneumatic scrap system) are exempt from state permit requirements pursuant to 35 IAC 201.146(kkk).

If you have any questions on this permit, please contact Jason Schnepf at 217/785-1705.

Robert W. Bernoteit  
Acting Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

RWB:JMS:psj

cc: Region 1

Graphic Packaging International, Inc.  
I.D. No.: 043020AAC  
Permit No.: 95090022

Date Received: 12/29/2011  
Date Issued: 10/22/2013

Table 1: Revised Netting Analysis (Tons/Year)

Updated August 15, 2013

	Date	Permit	VOM
Project Emissions Increases	Est. 2011-2013	11080040	41.6 <sup>a</sup>
Contemporaneous <sup>b</sup> Increases			
Gluer	9/2008	08080035	0.1
Gluer	9/2009	09050056	0.1
Increases Subtotal			0.2
Contemporaneous <sup>b</sup> Decreases			
Lithographic Press #3	Est. 2013	11080040	2.0
Rotogravure Press #9 <sup>c</sup>	8/2009	11080040	5.0
Decreases Subtotal			7.0
NET EMISSIONS CHANGE			34.8
Significance Threshold			40
Greater Than Significant			No

Notes:

- a. The project emissions are limited to 35.2 tons per year until Press #3 has been permanently shutdown.
- b. The contemporaneous time period begins August 16, 2006.
- c. Includes the VOM emissions attributable to natural gas combustion in the P-9 Gravure Afterburner.

## Section 8 - State Only Requirements

### 1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

<i>Pollutant</i>		<i>Tons/Year</i>
Volatile Organic Material	(VOM)	163.17
Sulfur Dioxide	(SO <sub>2</sub> )	0.09
Particulate Matter	(PM)	1.53
Nitrogen Oxides	(NO <sub>x</sub> )	14.38
HAP, not included in VOM or PM	(HAP)	-----
Total		178.73

Graphic Packaging International, Inc.  
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## Attachment 1 - List of Emission Units at This Source

<i>Section</i>	<i>Emission Units</i>	<i>Description</i>
4.1	Press #2	Sheet-fed non-heatset offset lithographic printing line used to print on boxboard and/or paperboard substrate.
4.1	Press #4	Sheet-fed non-heatset offset lithographic printing line used to print on boxboard and/or paperboard substrate.
4.1	Press #5a	Sheet-fed non-heatset offset lithographic printing line used to print on boxboard and/or paperboard substrate.
4.1	Press #6	Sheet-fed non-heatset offset lithographic printing line used to print on boxboard and/or paperboard substrate.
4.2	Press #3	Sheet-fed non-heatset offset lithographic printing line used to print on boxboard and/or paperboard substrate.
4.3	Press #8	A movable flexographic printing unit with a single color printing station that uses water-based flexographic inks. The press is moved and mounted on different equipment depending on the type of job that needs to be performed.
4.4	Gluer Lines (#47, #48, #50, #51, #52, #54, #56, #59, #60)	In the finishing department folding, gluing, windowing, and otherwise completing manufacturing of folding cartons to customer specifications is performed. The gluers are the only emission units in this department that are considered significant. The other units are listed as "insignificant" activities.
4.5	Natural Gas-Fired Boiler #1	A natural gas fired boiler, which has a firing rate of 16.74 mmBtu/hr, used to heat the folding carton facility and provide hot water for sinks and restrooms.
4.5	Natural Gas-Fired Boiler #2	A natural gas fired boiler, which has a firing rate of 16.74 mmBtu/hr, used to heat the folding carton facility and provide hot water for sinks and restrooms.

## Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
BTU	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EAF	Electric arc furnace
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Green house gas
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
HP	Horsepower
hr	Hour
H <sub>2</sub> S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
KW	Kilowatts
LAER	Lowest Achievable Emission Rate

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lb	Pound
m	Meter
MACT	Maximum Achievable Control Technology
mm	Million
mon	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

Attachment 3 - Contact and Reporting Addresses

<p style="text-align: center;">IEPA Compliance Section</p> <p style="text-align: center;">IEPA Stack Test Specialist</p> <p style="text-align: center;">IEPA Air Quality Planning Section</p> <p style="text-align: center;">IEPA Air Regional Field Operations Regional Office #1</p> <p style="text-align: center;">IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance &amp; Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, Illinois 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p style="text-align: center;">USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604</p> <p>Phone No.: 312/353-2000</p>

**Attachment 4 - Example Certification by a Responsible Official**

**SIGNATURE BLOCK**

NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.

I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))

AUTHORIZED SIGNATURE:

BY:

\_\_\_\_\_

\_\_\_\_\_

AUTHORIZED SIGNATURE

TITLE OF SIGNATORY

\_\_\_\_\_

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

TYPED OR PRINTED NAME OF SIGNATORY

DATE

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