217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Lawson Mardon Flexible
Attn: Dominick E. Zumbo, Project/Process Engineer
5303 St. Charles Road
Bellwood, Illinois 60104-1089

Application No.: 95090030 I.D. No.: 031015AAM
Applicant's Designation: Date Received: September 6, 1995
Operation of: Flexographic Printing Facility
Date Issued: July 8, 1999 Expiration Date[2]: July 8, 2004
Source Location: 5303 St. Charles Road, Bellwood, Cook
Responsible Official: Timothy Nicholson, Site Manager

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

Revision Date Received: May 24, 2001
Revision Date Issued: September 20, 2001
Purpose of Revision: Administrative Amendment

This administrative amendment incorporates the construction and/or modification permitted in Construction Permits 99120049 and 00120009. Because the changes in the permit were only administrative, no formal public notice was issued.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous permit issued July 8, 1999 is incorporated herein by reference.

Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

If you have any questions concerning this permit, please contact Yeric Yarrington at 217/782-2113.

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

DES:YY:jar

cc: Illinois EPA, FOS, Region 1
USEPA

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

[2] Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Lawson Mardon Flexible
5303 St. Charles Road
Bellwood, Illinois 60104-1089
708/544-1600

I.D. No.: 031015AAM
Standard Industrial Classification: 2671, Packaging Paper & Plastics Film Coated
2754, Flexographic Printing

1.2 Owner/Parent Company

Lawson Mardon Packaging USA, Inc.
1101 Wheaton Avenue
Millville, New Jersey 08332-2047

1.3 Operator

Lawson Mardon Flexible
5303 St. Charles Road
Bellwood, Illinois 60104-1089

Dominick E. Zumbo
708/649-3844

1.4 General Source Description

Lawson Mardon Flexible is located at 5303 St. Charles Road in Bellwood, Illinois. The source is a flexographic printing firm, manufacturing flexible packaging for food, household and commercial products industry. The major source of emissions are the five flexographic printing lines.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	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
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
°F	degrees Fahrenheit
gal	gallons
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilograms
kW	kilowatts
lb	pound
Mg	megagrams
mmBtu	Million British thermal units
mmHg	millimeters mercury
mo	month
NESHAP	National Emission Standard for Hazardous Air Pollutants
NO_X	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
psi	pounds per square inch
psia	pounds per square inch absolute
SO_2	Sulfur Dioxide
T	tons
T1	Title I – identifies Title I conditions that have been carried over from an existing construction 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 construction permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

> Make up air units that would not emit more than 1 lb/hour of any regulated pollutant not listed as hazardous pursuant to Section 112(b) of the Clean Air Act in the absence of air pollution control equipment; would not emit more than 0.1 lb/hr of any regulated pollutant listed as hazardous pursuant to Section 112(b) of the Clean Air Act in the absence of air pollution control equipment; and is not a process unit.

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

> Soak tank with lid, solvent storage tank, mixing equipment, and trim collection system with emissions that never exceed 0.1 lb/hr or 0.44 tons/year of any regulated pollutant in the absence of air pollution control equipment and that do not emit any pollutant listed as hazardous pursuant to Section 112(b) of the Clean Air Act.

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

> Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Addition of Insignificant Activities

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

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

3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Emission Control Equipment
Flexo Presses 1, 2, 3, 4, 5 & 6, Press 1/Coater 2, and Reversing Print Deck on Press 3	Flexographic Printing Presses each with Between Color and Overhead Dryers and 1 Gravure Coater with In-Line Dryer, Running Non-Compliant Coatings	Catalytic Oxidizer System
Press 1/Coater 1 Press 1/Coater 2 Press 2/Coater Press 3/Coater Press 4/Coater Press 5/Coater Press 6/Coater 1 Press 6/Coater 2	7 Gravure Coaters with Dedicated In-Line Dryers, Running Compliant Coatings	None
Parts Washing System	Enclosed Solvent Parts Washing System	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

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

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. 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 overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

b. 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 the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, 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. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	270.44
Sulfur Dioxide (SO_2)	0.03
Particulate Matter (PM)	0.37
Nitrogen Oxides (NO_x)	4.88
HAP, not included in VOM or PM	---
TOTAL	275.72

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology,

e.g., by appropriately summing the product of the weight percent of each HAP in the organic material emissions for each organic liquid and the organic material emissions attributable to the storage and handling of that liquid, as determined by the current version of the TANKS program.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the requirements of 40 CFR 63 Subpart KK - National Emission Standards for the Printing and Publishing Industry do not apply to the source.

5.5.3 Other Source-Wide Emission Limitations

a. Emissions from the affected printing lines shall not exceed the following limit:

Emission Unit	VOM Emissions (Tons/Year)
Press 1/Coater 1 Press 1/Coater 2 Press 2/Coater 1 Press 3/Coater 1 Press 4/Coater 1 Press 5/Caoter 1 Press 6/Coater 1	27.56

This limit is based on information provided in the permit application.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitation was established in Construction Permit 91080038, pursuant to 35 IAC Part 203. This limit ensures that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

b. Emissions from Press 4 and Press 4/Coater shall not exceed the following limits:

VOM Emissions (Tons/Month)	(Tons/Year)
2.5	18.74

This limit is based on information provided in the permit application.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitation was established in Construction Permit 00120009, pursuant to 35 IAC Part 203. This limit ensures that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

a. Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

b. Natural gas usage for the source, $mmft^3$/mo and $mmft^3$/yr; and

c. Monthly and annual aggregate NO_x, PM, SO_2, and VOM emissions from the combustion of natural gas shall be maintained, based on the operating schedule, fuel usage, and the applicable emission factors, with supporting calculations.

5.6.2 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items to verify that the source is not a major source for HAP emissions and therefore not subject to 40 CFR 63, Subpart JJ, and to quantify annual VOM emissions, so as to demonstrate compliance with the limits in Condition 5.5.2:

a. Records maintained on a monthly basis for the previous month:

i. Total usage of each coating and cleaning solution used, lb/month;

ii. Weight percent VOM of each coating and cleaning solution used on the coaters identified in Condition 5.5.3;

iii. Total usage of each individual HAP, and total combined HAPs from the source, tons/month;

iv. Total emissions of VOM from the coaters identified in Condition 5.5.3, each individual HAP, and total combined HAPs from the source, tons/month, with supporting calculations; and

v. Amounts of reclaimed VOM waste including VOM content of the reclaimed waste from the coaters identified in Condition 5.5.3, ton/month.

5.6.5 Records for Operating Scenarios

N/A

5.6.6 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and

b. The total emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

a. For the purpose of estimating HAP emissions from equipment at the source, the weight percent of each HAP in a product times the weight of the product used is acceptable.

b. Coating VOM emissions = Coating usage (lb/month) x Weight percent VOM in the coating

Cleaning solvent VOM emissions = Cleaning solvent usage (lb/month) x Weight percent VOM in the cleaning solvent

Total VOM emissions = Coating VOM emissions + Cleaning solvent VOM emissions – Reclaimed VOM wastes

c. Emissions from the combustion of natural gas shall be calculated based on the following emission factors and formulas:

Pollutant	Natural Gas Emission Factor ($lb/mmft^3$)
NO_x	100
PM	7.6
SO_2	0.6
VOM	5.5

Where emission factors for NO_x, PM, SO_2 and VOM for uncontrolled natural gas combustion in small boiler (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Updated March, 1998.

Emissions (lb) = (natural gas consumed, $mmft^3$) x (the appropriate emission factor, lb/ $mmft^3$)

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a “cap and trade” market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, participating sources must hold “allotment trading units” (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources’ CAAPP permits. These allotments are established from historical VOM emissions or “baseline emissions” lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account’s balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources’ accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

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

6.3 Obligation to Hold Allotment Trading Units (ATUs)

a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to “emissions excursion compensation,” as described in Condition 6.4.

i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;

ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;

iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);

iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and

v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).

b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).

d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:

i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or

ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.

b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source’s next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.650(a), and shall be submitted in accordance with the following:

i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and

ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:

i. Actual seasonal emissions of VOM from the source;

ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;

iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;

iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;

v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data are

not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 706 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 80.1721 tons.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Section 7 of this permit.

iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

Not applicable.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and

iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

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

a. Seasonal component of the Annual Emission Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

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

6.11 Exclusions from Further Reductions

a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [35 IAC 205.405(a)]:

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; and

iii. An emission unit for which a LAER demonstration has been approved by the Agency on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

None

b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reductions requirements specified in IAC 205.400(c) or (e) as long as such

emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit Flexographic and Gravure Printing Presses Control Catalytic Thermal Oxidizers

7.1.1 Description

Flexographic presses are used to print flexible packaging for the food industry, and other printed materials. Each press has a between color and an overhead dryer. All presses are controlled by two identical catalytic oxidizers. Emissions of volatile organic material (VOM) result from the use of printing-related materials such as inks, and cleaning solvents. The Gravure Coater is used to apply non-compliant adhesives and coatings to flexible packaging for the food industry, and other printed materials. This coater has an inline dryer. Emissions of volatile organic material (VOM) result form the use of coating-related materials such as coatings, and cleaning solvents. Natural gas is used in the press dryers. Emissions of NO_x, PM, SO_2, and VOM result from fuel combustion.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Press 1	Flexographic Press with a Between Color and an Overhead Dryer	1968	Catalytic Oxidizer System
Press 2	Flexographic Press with a Between Color and an Overhead Dryer	1966	Catalytic Oxidizer System
Press 3	Flexographic Press with a Between Color and an Overhead Dryer	1966	Catalytic Oxidizer System
Press 4	Flexographic Press with a Between Color and an Overhead Dryer	2001	Catalytic Oxidizer System
Press 5	Flexographic Press with a Between Color and an Overhead Dryer	1986	Catalytic Oxidizer System
Press 6	Flexographic Press with a Between Color and an Overhead Dryer	1991	Catalytic Oxidizer System
Press 1/ Coater 2	Gravure Coater with In-Line Dryer	1988	Catalytic Oxidizer System

Emission Unit	Description	Date Constructed	Emission Control Equipment
Reversing Print Deck on Press 3	Flexographic Press with a Between Color and an Overhead Dryer	2000	Catalytic Oxidizer System

7.1.3 Applicable Regulations

a. Each printing press is an “affected printing line” for purposes of these unit-specific conditions. The Gravure coater is a part of Press 1’s affected printing line when it is using a non-compliant coating.

b. The affected printing lines are subject to 35 IAC 212.321(a), which requires that:

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, i.e. one for which construction or modification commenced on or after April 14, 1972, either alone or in combination with the emission of particulate matter 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 subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the new affected printing lines shall not exceed the allowable emission rates specified in the following equation

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

Where:

P = Process weight rate; and,
E = Allowable emission rate; and,

1. For process weight rates up to 408 MG/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour.

[35 IAC 212.321]

c. The affected printing lines are subject to 35 IAC 212.322(a), which requires that:

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing process emission unit, i.e. one for which construction or modification commenced prior to April 14, 1972, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the existing affected printing lines shall not exceed the allowable emission rates specified in the following equation

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

Where:

P = Process weight rate; and,
E = Allowable emission rate; and,

1. For process weight rates up to 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour.

[35 IAC 212.322]

d. No owner or operator of a subject flexographic, packaging rotogravure or publication rotogravure printing line equipped with a capture system and control device shall operate the subject printing line unless the owner or operator meets the following requirements:

i. An incineration system is used which reduces the captured VOM emissions by at least 90 percent by weight;

ii. The printing line is equipped with a capture system and control device that provides an overall reduction in VOM emissions of at least:

A. 75 percent where a publication rotogravure printing line is employed.

B. 65 percent where a packaging rotogravure printing line is employed.

C. 60 percent where a flexographic printing line is employed.

iii. The control device is equipped with the applicable monitoring equipment specified in 35 IAC Section 218.105(d)(2) and except as provided in 35 IAC Section 218.105(d)(3), the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times the control device is in use;

iv. The capture system and control device are operated at all times when the subject printing line is in operation. The owner or operator shall demonstrate compliance with this subsection by using the applicable capture system and control device test methods and procedures specified in 35 IAC Section 218.105(c) through Section 218.105(f) and by complying with the recordkeeping and reporting requirements specified in 35 IAC Section 218.404(e).

[35 IAC 218.401(c)]

7.1.4 Non-Applicable Regulations

a. Affected printing lines are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.401(b), which excludes the affected printing lines from these requirements.

b. The affected printing lines are not subject to 35 IAC 218.204(c), coating operations-Paper coating, as the paper coating limitation does not apply to a line on which printing is performed which complies with the emission limitations in 35 IAC 218.401 [35 IAC 218.204(c)].

c. The New Source Performance Standard for Publication Rotogravure Printing, 40 CFR Subpart QQ, applies to units constructed, modified, or reconstructed after October 28, 1980. The presses at this source do not meet the definition for a publication rotogravure printing press, which means any number of rotogravure printing units capable of printing simultaneously on the same continuous web or substrate and includes any associated device for continuously cutting and folding the printed web, where the following saleable paper products are printed. Therefore this regulation does not apply.

d. The National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK, applies to sources which are major for emissions of HAP. This source is not a major source of HAPs and therefore is only required to keep records of HAP emissions. (see also Condition 5.5)

7.1.5 Operational Limitations

Each affected printing line shall only be operated with natural gas as the fuel in the press dryers.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, including Condition 5.5.3 which contains additional limits for Press 1/Coater 2, affected printing lines are subject to the following:

Emissions from the affected printing lines shall not exceed the following limits:

Emission Unit	VOM Emissions (Tons/year)
Press 1, 2, 3	99.5
Press 5	57.63
Press 6	57.63
Reversing Press Deck On Press 3	3.0 (0.3 Ton/Month)

These limits are based on information provided in the permit application.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Construction Permits 91080038 and 99120049, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.1.7 Testing Requirements

Testing for VOM content of inks and other printing materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

a. On at least an annual basis:

i. The VOM content of representative inks and coatings “as applied” on affected printing lines 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).

ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee’s records pursuant to Condition 7.1.9(b) directly reflect the application of such material and separately account for any additions of solvent.

iii. Upon written request from the Permittee, the Illinois EPA may waive this requirement on a year-by-year basis, if prior testing shows a margin of compliance and no significant changes in coating supplies have occurred.

b. Upon reasonable request by the Illinois EPA, the VOM content of specific inks, coatings, and cleaning solvents used on affected printing lines 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) [35 IAC 218.105(a) and 218.404(a)].

7.1.8 Monitoring Requirements

The catalytic oxidizers shall be equipped with continuous monitoring devices which are installed, calibrated, operated and maintained according to vendor specifications at all times the oxidizers are in use. These monitoring devices shall monitor the temperature rise across each catalytic bed or VOM concentration of exhaust [218.105(d)(2)].

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected printing line to demonstrate compliance with Conditions 5.5.1 and 7.1.3 pursuant to Section 39.5(7)(b) of the Act:

a. Control device monitoring data each day the oxidizer operates [35 IAC 218.404(e)(2)(A)];

b. A log of the operating time for the capture system, control device, monitoring equipment and the printing and coating operations [35 IAC 218.404(e)(2)(B)];

c. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages [35 IAC 218.404(e)(2)(C)];

d. The name and identification number of each coating and ink as applied on the affected printing lines;

e. The usage of each ink and solvent in gallons or pounds on a monthly basis;

f. The VOM content of each coating, ink and solvent in weight percent VOM;

g. The most recent emissions test report for each coating line.

h. Records shall be maintained of the VOM content of each cleaning solvent used on the affected printing lines as follows:

i. The VOM content of these materials, lb VOM/gal with source of data, i.e., as determined from material safety data sheets, manufacturer specifications, process formulation data,

and/or testing using USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A; and

ii. Records of material consumption shall be maintained for cleaning solvent used on the affected printing lines on a monthly basis.

i. Monthly and the aggregate annual VOM emissions from the affected printing lines based on the operating schedule and the typical hourly emission rate, with supporting calculations;

j. Amounts of reclaimed VOM waste including VOM content of the reclaimed waste, ton/mo and ton/yr.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected printing lines with the permit requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. Any record showing violation of Condition 7.1.3(d) (35 IAC 218.401(c)) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.404(e)(3)(A)].

b. Pursuant to 35 IAC 218.404(e)(3)(B) and 35 IAC 218.404(c)(1) at least 30 calendar days before changing the method of compliance with Section 218.401 of this Part from Section 218.401(c) of this Part to Section 218.401(a) or (b) of this Part, the owner or operator shall comply with all requirements of subsection (c)(1) or (d)(1) of this Section, respectively. Upon changing the method of compliance with Section 218.401 of this Part from Section 218.401(c) of this Part to Section 218.401(a) or (b) of this Part, the owner or operator shall comply with all requirements of subsection (c) or (d) of this Section, respectively.

c. Emissions of PM from the affected printing lines in excess of the limits specified in Condition 7.1.3(b) or 7.1.3(c) based on the operating rate and emission factor in Condition 7.1.12 within 30 days of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected

printing lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

a. Usage of inks, coatings, or cleaning solvents at this source, provided that the Permittee continues to comply with the Conditions 5.5, 7.1.3(b), and 7.1.6 of this permit;

b. Use of low VOM, UV, or water based coatings; and

c. Use of low VOM cleaning solvents.

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

a. To determine compliance with Condition 5.5.1, emissions from the affected printing lines shall be calculated based on the following:

Coating and Ink emissions = Coating and Ink usage (lb/month) x weight percent VOM x [1 – (Capture Efficiency x Destruction Efficiency/100)]

Cleaning solvent VOM emissions = Cleaning solvent usage (lb/month) x weight percent VOM

Total VOM emissions = Ink and Coating VOM emissions + Cleaning solvent VOM emissions - Reclaimed VOM Waste

b. Compliance with Condition 7.1.3(b) and (c) is assured to be achieved by the work-practices inherent in this operation.

7.2 Unit Gravure Coaters
Control None

7.2.1 Description

Gravure coaters are used to apply adhesives and coatings to flexible packaging for the food industry, and other printed materials. Each coater has an inline dryer. Emissions of volatile organic material (VOM) result from the use of coating-related materials such as coatings, and cleaning solvents. Natural gas is used in the coater dryers. Emissions of NO_x, PM, SO_2, and VOM result from fuel combustion.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Press 1/Coater 1	Gravure Coater with an Inline Dryer	1988	None
*Press 1/Coater 2	Gravure Coater with an Inline Dryer	1988	None
Press 2/Coater	Gravure Coater with an Inline Dryer	1983	None
Press 3/Coater	Gravure Coater with an Inline Dryer	1985	None
Press 5/Coater	Gravure Coater with an Inline Dryer	1989	None
Press 6/Coater 1	Gravure Coater with an Inline Dryer	1991	None
Press 6/Coater 2	Gravure Coater with an Inline Dryer	1996	None
Press 4/Coater	Gravure Coater with an Inline Dryer	2001	None

* Press 1/Coater 2: Use of non-compliant coatings on this unit are addressed in Section 7.1

7.2.3 Applicability Provisions and Applicable Regulations

a. Each gravure coater is an “affected printing line” for purposes of these unit-specific conditions.

b. The affected printing lines are subject to 35 IAC 212.321(a), which requires that:

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any

one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter 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 subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected paint spray booths shall not exceed the allowable emission rates specified in the following equation

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

Where:

P = Process weight rate; and,
E = Allowable emission rate; and,

1. For process weight rates up to 408 MG/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour.

[35 IAC 212.321]

c. Each affected printing line at the source is subject to 35 IAC 218.401(a) for flexographic and rotogravure printing which provides that:

i. No owner or operator of an affected printing line shall apply at any time any coating or ink in which the VOM content exceeds the following emission limitations for the coating or ink as applied.

1. Forty percent VOM by volume of the coating and ink (minus water and any compounds which are specifically exempted from the definition of VOM), or

2. Twenty-five percent VOM by volume of the volatile content in the coating and ink.

ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the “less water” part of the coating or ink composites.

[35 IAC 218.401(a)]

7.2.4 Non-Applicability of Regulations of Concern

a. Affected printing lines are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, which excludes the affected paper coaters from these requirements.

b. The affected printing lines are not subject to 35 IAC 218.204(c), coating operations-Paper coating, as the paper coating limitation does not apply to a line on which printing is performed which complies with the emission limitations in 35 IAC 218.401 [35 IAC 218.204(c)].

c. The New Source Performance Standard for Publication Rotogravure Printing, 40 CFR Subpart QQ, applies to units constructed, modified, or reconstructed after October 28, 1980. The coaters at this source do not meet the definition for a publication rotogravure printing press, which means any number of rotogravure printing units capable of printing simultaneously on the same continuous web or substrate and includes any associated device for continuously cutting and folding the printed web, where the following saleable paper products are printed. Therefore this regulation does not apply.

d. The National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK, applies to sources which are major for emissions of HAP. This source is not a major source of HAPs. (see also Condition 5.5)

7.2.5 Control Requirements

Each affected printing line shall only be operated with natural gas as the fuel in the coater dryers.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, including Condition 5.5.3 which contains additional limits for coaters, the affected printing lines are subject to the following:

Emissions from the affected printing lines shall not exceed the following limits:

Emission Unit	VOM Emissions (Tons/year)
Press 6/Coater 2	0.22

These limits are based on information provided in the permit application.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Construction Permit 96090006, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically, 35 IAC Part 203 [T1].

7.2.7 Testing Requirements

Testing for VOM content of coatings and other coating materials shall be performed as follows [35 IAC 218.105(a), 218.404(a), and Section 39.5(7)(b) of the Act]:

a. On at least an annual basis:

i. The VOM content of representative inks and coatings “as applied” on affected printing lines 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).

ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee’s records pursuant to Condition 7.2.9(b) directly reflect the application of such

material and separately account for any additions of solvent.

iii. Upon written request from the Permittee, the Illinois EPA may waive this requirement on a year-by-year basis, if prior testing shows a margin of compliance and no significant changes in coating supplies have occurred.

b. Upon reasonable request by the Illinois EPA, the VOM content of specific inks, coatings, and cleaning solvents used on affected printing lines 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) [35 IAC 218.105(a) and 218.404(a)].

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected printing line to demonstrate compliance with Conditions 5.5.1 and 7.2.3 pursuant to Section 39.5(7)(b) of the Act:

a. Records of the testing of VOM content of coatings, inks, and cleaning solvents pursuant to Condition 7.2.7, which include the following [Section 39.5(7)(e) of the Act]:

i. Identification of material tested.

ii. Results of analysis.

iii. Documentation of analysis methodology.

iv. Person performing analysis.

b. The Permittee shall collect and record all of the following information each day for each affected printing line [35 IAC 218.404(c)]:

i. The name and identification number of each coating as applied; and

ii. The VOM content of each coating as applied (weight percent VOM).

c. Coating usage (lb/month).

d. Records shall be maintained of the VOM content of each cleaning solvent used on the affected paper coaters as follows:

i. The VOM content of these materials, weight percent VOM with source of data, i.e., as determined from material safety data sheets, manufacturer specifications, process formulation data, and/or testing using USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A; and

ii. Records of material consumption shall be maintained for cleaning solvent used on the affected printing lines on a monthly basis.

e. Monthly and annual aggregate VOM emissions from the affected printing lines based on the operating schedule and the typical hourly emission rate, with supporting calculations; and

f. Amounts of reclaimed VOM waste including VOM content of the reclaimed waste, ton/mo and ton/yr;

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected coaters with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. Any record showing violation of Condition 7.2.3(d) (35 IAC 218.204) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.211(c)(3)(A)].

b. At least 30 calendar days before changing the method of compliance from 35 IAC Section 218.204 to Section 218.205 or 218.207, the owner or operator shall comply with all requirements of subsection (d)(1) or (e)(1) of this Section, respectively. Upon changing the method of compliance with 35 IAC Section 218.204 from 35 IAC Section 218.204 to Section 218.205 or 218.207, the owner or operator shall comply with all requirements of 35 IAC Section 218.211(d) or (e), respectively.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected paper

coaters without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

a. Usage of inks, coatings, or cleaning solvents at this source, provided that the Permittee continues to comply with the Conditions 5.5, 7.2.3(b), and 7.2.6 of this permit;

b Use of low VOM, UV, or water based coatings; and

c. Use of low VOM cleaning solvents.

7.2.12 Compliance Procedures

a. To determine compliance with Condition 5.5.1, emissions from the affected paper coaters shall be calculated based on the following:

Ink and Coating VOM emissions = Ink and Coating usage (lb/month) x weight percent VOM

Cleaning solvent VOM emissions = Cleaning solvent usage (lb/month) x weight percent VOM

Total VOM emissions = Ink and Coating VOM emissions + Cleaning solvent VOM emissions - Reclaimed VOM Wastes

7.3 Unit Parts Washer
Control None

7.3.1 Description

Ink and coating covered parts are washed in the solvent parts washer. Spent cleaning solvent is routed to primary and secondary in-line vacuum distillation units (insignificant emissions).

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Parts Washing System	Enclosed Solvent Parts Washer	1998	None

7.3.3 Applicability Provisions and Applicable Regulations

a. Each parts washer is an “affected parts washer” for purposes of these unit-specific conditions.

b. The affected parts washer is subject to 35 IAC 218.182 for cold cleaning degreasing.

c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

d. On or after March 15, 1999, no person shall operate a cold cleaning degreaser with a solvent vapor pressure which exceeds 2.0 mmHg (0.038 psi) measured at 20°C (68°F).

e. On or after March 15, 2001, no person shall operate a cold cleaning degreaser with a solvent vapor pressure which exceeds 1.0 mmHg (0.019 psi) measured at 20°C (68°F).

7.3.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected parts washer not being subject to 35 IAC 218 Subpart TT, Fabricated Product Manufacturing Processes, because the affected parts washer does not meet the applicability of 35 IAC 218.980(a) and (b). In particular, the affected parts washer has:

a. Maximum theoretical emissions of VOM that are less than 90.7 Mg (100 tons) per year; and

b. A potential to emit for VOM that is less than 22.7 Mg (25 tons) per year.

7.3.5 Operational and Production Limits and Work Practices

a. Operating Procedures: No person shall operate a cold cleaning degreaser unless:

i. Waste solvent is stored in covered containers only and not disposed of in such manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;

ii. The cover of the degreaser is closed when parts are not being handled; and

iii. Parts are drained until dripping ceases.

b. No person shall operate a cold cleaning degreaser unless:

i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counter-weights or a powered system if:

A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38^{o}C (100^{o}F);

B. The solvent is agitated; or

C. The solvent is heated above ambient room temperature.

ii. The degreaser is equipped with a device for draining cleaned parts. The drainage device shall be constructed so that parts are enclosed under the cover while draining unless:

A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38^{o}C (100^{o}F); or

B. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external.

iii. The degreaser is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F) or if the solvent is heated above 50°C (120°F) or its boiling point:

A. A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or

B. Any other equipment or system of equivalent emission control as approved by the Agency and further processed consistent with Section 218.108 of this Part. Such a system may include a water cover, refrigerated chiller or carbon adsorber.

iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and

v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.

[35 IAC 218.182]

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected printing lines are subject to the following:

Emissions from the affected source shall not exceed the following limits:

Emission Unit	Emission Factor (lbs/wash cycle)	VOM Emissions (lbs/hr)	(T/year)
Parts Washing System	0.60	1.2	5.04

These limits are based on the emission factor and maximum wash cycles (2 cycles/hour and 750 cycles/year) as provided in the permit application.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Construction Permit 98090072, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.3.7 Testing Requirements

a. The following test methods shall be used to demonstrate compliance with 35 IAC 218 Subpart E:

i. Vapor pressures shall be determined by using the procedure specified in 35 IAC 218.110 [35 IAC 218.186(a)];

ii. Exhaust ventilation rates shall be determined by using the procedures specified in 35 IAC 218.105(f)(3) [35 IAC 218.186(b)]; and

iii. The performance of control devices shall be determined by using the procedures specified in 35 IAC 218.105(f) [35 IAC 218.186(c)].

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected parts washer to demonstrate compliance with Conditions 5.5.1, 7.3.3, and 7.3.6 pursuant to Section 39.5(7)(b) of the Act:

a. The name and address of the solvent supplier;

b. The date of purchase of the solvent;

c. The type of solvent;

d. Records of the makeup and additive solvent usage for the affected parts washer, gal/mo & gal/yr;

e. The VOM content of the solvent, % by Wt;

f. Density of solvents, lb/gal;

g. Vapor pressure of solvent measured at 20°C (68°F), (mmHg);

h. The aggregate monthly and annual VOM emissions from the affected parts washer based on solvent usage, with supporting calculations; and

i. For compounds determined to be photochemically reactive, the hours of operation and hourly VOM emissions from the affected parts washer based on solvent usage and operating hours, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected parts washer with the permit requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. Upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that this emission unit is exempt from those requirements [35 IAC 218.990].

b. Emissions of VOM from the affected parts washer in excess of the limits specified in Condition 7.3.3 or 7.3.6 within 30 days of such an occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

To determine compliance with Conditions 5.5.1, 7.3.3, and 7.3.6, VOM emissions from the affected parts washer shall be calculated based on the following:

Total VOM Emissions (T/yr) = VOM Makeup and Additive Solvent Usage (gal/yr) x Density of Solvent (lb/gal) x VOM Content of Solvent (% wt.)

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after March 24, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any 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].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written

notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

a. Describe the physical or operational change;

b. Identify the schedule for implementing the physical or operational change;

c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. 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 source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

iii. Illinois EPA - Air Permit Section (MC 11)

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

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

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

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 (“Title I provisions”) and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of 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, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

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

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission

limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated 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.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if 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].

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

YY:jar