

217/782-2113

JOINT CONSTRUCTION AND LIFETIME OPERATING PERMIT

PERMITTEE

Meyercord Revenue Company
Attn: Irma Hrycyk
475 Village Drive
Carol Stream, Illinois 60188

<u>Application No.:</u> 01050092	<u>I.D. No.:</u> 043020ACH
<u>Applicant's Designation:</u> REVENUE-01	<u>Date Received:</u> May 30, 2001
<u>Subject:</u> Tax Stamp Printing and Print Pad Manufacturing	
<u>Date Issued:</u> October 4, 2001	<u>Operating Permit Expiration</u>
	<u>Date:</u> See Condition 1.

Location: 475 Village Drive and 475 North Gary Avenue, Carol Stream

This permit is hereby granted to the above-designated Permittee to CONSTRUCT and OPERATE emission unit(s) and/or air pollution control equipment consisting of:

One Rotogravure Press with Oven
Ink-Jet Numbering Machine
Ink-Jet Imaging System
Ink Mixing
Parts Washer
58 Natural Gas-Fired Combustion Units
Trans Tech America Operations: Ink Mixing and Solvent Repackaging Operations

pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This operating permit is effective only if the Permittee has complied with all standard conditions of the construction permit.
 - b. Operation of the emission units included in this permit shall not begin until all associated air pollution control equipment has been constructed and is operational.
 - c. This operating permit shall expire 180 days after the Illinois EPA sends a written request for the renewal of this permit.
 - d. This permit shall terminate if it is withdrawn or is superseded by a revised permit.
- 2a. These conditions effectively limit the potential emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) to less than 25 tons per year, single hazardous air pollutant (HAP) to less than 10 tons per year, and a combination of all HAPs to less than 25 tons per year). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit.

- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- 3. The combined total actual emissions of volatile organic material (VOM) from the facilities located at 365 East North Avenue permitted under FESOP I.D. No. 043020AAF Application No. 75020058, at 475 Village Drive, and at 475 North Gary Avenue shall not exceed 25 tons per year. The three facilities have been classified as a single source.
- 4. This permit is issued based on the rotogravure printing line(s) being exempted from the requirements of 35 Ill. Adm. Code Section 218 Subpart H, "Printing and Publishing", pursuant to 35 Ill. Adm. Code 218.402. The combined total potential emissions of volatile organic material (VOM) from all rotogravure printing line(s) located at the 475 Village Drive, 475 North Gary Avenue, and 365 East North Avenue facilities (including solvents used for cleanup operations associated with the rotogravure printing line) shall be limited to less than 25 tons per year. Therefore, the requirements of 35 Ill. Adm. Code Section 218.401 are not applicable to the rotogravure printing lines.
- 5. Emissions of volatile organic material (VOM) and operation of the equipment shall not exceed the following limits:

<u>Equipment</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Rotogravure Press with Oven	2.0	19.6	2.0	19.6
Ink-Jet Numbering Machine				
Ink-Jet Imaging System				
Ink Mixing				
Parts Washer				
Trans Tech America Operations:				
Ink Mixing Operation and				
Solvent Repackaging Operation				

These limits define the potential emissions of VOM and are based on maximum material usage, individual VOM content, and limits as requested by the company. VOM usage shall be calculated using the equation in condition 9(e). Compliance with annual limits shall be determined from a running total of 12 months of data.

- 6a. Emissions and operation of all fuel combustion emission units at the 475 Village Drive and 475 North Gary Avenue facilities shall not exceed the following limits:

<u>Material</u>	<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>
				<u>Factor</u>	<u>(T/Mo)</u>
<u>(T/Yr)</u>				<u>(Lb/mmscf)</u>	

Natural Gas	18	180	NO _x	100	0.9
9.0			CO	84	0.8
7.6			TSP	7.6	0.1
0.7			VOM	5.5	0.1
0.5					

These limits define the potential emissions of NO_x, CO, TSP, and VOM and are based on maximum fuel usage and standard emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas shall be the only fuel used in all the fuel combustion units. Use of any other fuel other than natural gas requires a permit revision.
7. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
8. Pursuant to 35 Ill Adm. Code Section 218.404 (b), an owner or operator of a rotogravure printing line exempted from the limitations of Section 218.401 shall collect and record all of the following information each year for each printing line and maintain the information at the source for a period of three years:
 - a. The name and identification number of each ink as applied on each printing line.
 - b. The VOM content and the amount of each ink as applied each year on each printing line.
 - c. On and after a date consistent with Section 218.106 of this Part, the owner or operator of a flexographic and rotogravure printing line exempted from the limitations of Section 218.401 of this Part because of the criteria in Section 218.402 of this Part shall notify the Agency of any record showing that total maximum theoretical emissions of VOM from all printing lines exceed 90.7 Mg (100 tons) in any calendar year before the application of capture systems and control devices by sending a copy of such record to the Agency within 30 days after the exceedance occurs.
9. The Permittee shall maintain monthly records of the following items:
 - a. Identification and amount of each ink, primer, clean up solvent, thinner, and any other material used containing VOM and/or HAP at all the facilities (gal or ton/mo and gal or ton/yr);

- b. VOM content of each ink, primer, clean up solvent, thinner, and any other material used containing VOM and/or HAP at all the facilities (lb VOM/gal or weight %);
- c. Individual HAP content of each ink, primer, clean up solvent, thinner, and any other material used containing VOM and/or HAP at all the facilities (lb VOM/gal or weight %);

- d. Total natural gas usage at all the facilities (mmscf/mo and mmscf/yr); and
- e. Detailed calculations of VOM and individual HAP usages for each emission source at all the facilities using the following equation:

$$T_e = \sum_i^n A_i B_i$$

Where:

T_e = VOM or single HAP usage in units of lb/mo

n = Number of different VOM and/or HAP containing material used each month;

i = Subscript denoting an individual VOM and/or HAP containing material

A_i = Weight of VOM or single HAP per volume of each solvent used each month in units of lbs VOM or HAP/gal or weight percent of VOM/HAP or single HAP of each VOM containing material used each month (% weight)

B_i = Amount of each VOM and/or HAP containing material used each month in units of gal/mo or lb/mo

- f. Detailed calculations of VOM and individual HAP emissions for each emission unit at all the facilities (ton/mo and ton/yr).
- 10. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
 - 11. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

12. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

13. Persons with lifetime operating permits must obtain a revised permit for any of the following changes at the source:
- a. An increase in emissions above the amount the emission unit or the source is permitted to emit;
 - b. A modification;
 - c. A change in operations that will result in the source's noncompliance with conditions in the existing permit; or
 - d. A change in ownership, company name, or address, so that the application or existing permit is not longer accurate.

If you have any questions on this permit, please contact Tara T. Nguyen-Ede at 217/782-2113.

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

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cc: Region 1