DRAFT CAAPP PERMIT
March 13, 2007

217/782-2113

"RENEWAL"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Bluegrass Folding Carton Company, LLC
Attn: Dave Birtles
400 East North Avenue
Carol Stream, Illinois 60188

I.D. No.: ID# 043020AAC
Application No.: 95090022

Date Received: October 8, 2003
Date Issued: TO BE DETERMINED
Expiration Date: TO BE DETERMINED

Operation of: Printed Folding Cartons Manufacturing Plant
Source Location: 400 East North Avenue, Carol Stream, DuPage County, 60188
Responsible Official: Michael Egan, General Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a Printed Folding Cartons Manufacturing Plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

DES:AB:psj

cc: Illinois EPA, FOS, Region 1
CES
Lotus Notes

[1] Except as provided in Conditions 1.5 and 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Bluegrass Folding Carton Company, LLC
400 East North Avenue
Carol Stream, Illinois 60188
630/260-6500

I.D. No.: 043020AAC
County: DuPage
Standard Industrial Classification: 2657, Folding Paperboard Boxes

1.2 Owner/Parent Company

Bluegrass Folding Carton Company, LLC
400 East North Avenue
Carol Stream, Illinois 60188

1.3 Operator

Bluegrass Folding Carton Company, LLC
400 East North Avenue
Carol Stream, Illinois 60188

Dave Birtles
630/260-6500

1.4 Source Description

The source is located at 400 East North Avenue in Carol Stream. The source manufactures folding cartons from boxboard paperboard. Most of the plant's VOM emissions come from printing presses.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM), and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

a. This permit contains "Title I conditions" that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards 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
$PM_{2.5}$	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO_2	Sulfur Dioxide
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 CONDITIONS FOR 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:

Pneumatic Scrap System
Soil Vapor Extraction

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:

None

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:

a. 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)].

b. Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

c. Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.2.4 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.

3.3 Addition of Insignificant Activities

3.3.1 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).

3.3.2 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.

3.3.3 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	Date of Construction	Emission Control Equipment	Section of the CAAPP permit
Sheet-Fed Offset Lithographic Printing Presses	Press #2	1999	None	7.1
	Press #3	1991	None	7.1
	Press #4	1990	None	7.1
	Press #5a	2003	None	7.1
Rotogravure Printing Presses	Press #9	1963	Cor Pak Thermal Oxidizer	7.2
	Press #10	1973	Thermal Electron Thermal Oxidizer	7.2
Flexographic Printing Press	Press #8	2003	None	7.3
Aerators	Aerators #1 and #2	1979;1987	None	7.4
Boilers	Boilers #1 and #2	1962	None	7.5
Finishing Department	Finishing Department	1974	None	7.6
Parts Washer	Parts Washer	1990	None	7.7

5.0 OVERALL SOURCE CONDITIONS

5.1 Applicability of Clean Air Act Permit Program (CAAPP)

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

5.2 Area Designation

5.2.1 This source is located in an area that is designated non-attainment of the National Ambient Air Quality Standards for ozone and $PM_{2.5}$ and attainment for all other criteria pollutants.

5.3 Source-Wide Applicable Provisions and Regulations

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

5.3.2 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.

b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

5.3.3 Ozone Depleting Substances

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.

5.3.4 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.5 Future Emission Standards

a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).

b. This permit and the terms and conditions herein do not affect the Permittee’s past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

5.3.6 Episode Action Plan

a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144 and is incorporated by reference into this permit.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared by the Director of the Illinois EPA or his or her designated representative.

c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.

5.4 Source-Wide Non-Applicability of Regulations of Concern

a. This source is not subject to 40 CFR Part 60, Subpart QQ "Standards of Performance for the Graphic Arts Industry: Rotogravure Printing", because the source is not a printing and publishing facility.

b. This source is not subject to 40 CFR Part 63, Subpart KK “National Emission Standards for Printing and Publishing Industry”, because the source is not a major source of HAP emissions. (See also Condition 5.6.2)

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there may be requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 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 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	1,668.39
Sulfur Dioxide (SO_2)	0.12
Particulate Matter (PM)	37.30
Nitrogen Oxides (NO_x)	33.53
HAP, not included in VOM or PM	7.8
Total	1,747.13

5.6.2 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 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). For maintaining non-major HAP status, the Permittee shall fulfill the applicable testing, recordkeeping, and reporting requirements of Conditions 5.7.2, 5.9.2, and 5.10.2.

5.6.3 Other Source-Wide Production and Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for PSD, state rules for MSSCAM, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].

b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].

c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.7.2 HAP Testing to Verify Minor Source Status

Pursuant to Condition 5.7.1 and to verify compliance with the requirements of Condition 5.6.2, that is that this source is not a major source of HAPs, the following testing requirements are established:

a. If in the previous calendar year, emissions of HAPs exceeded 80% of major source threshold for individual or total HAPs (greater than 8 tons of a single HAP or greater than 20 tons of total HAPs), then testing for HAPs using USEPA Method 311 shall be conducted as follows:

   Test the top five inks and/or coatings that make the largest contributions to individual and total HAP emissions. The largest contributions are defined as the product of usage and HAP content. If two inks/coatings differ only in pigment, then both do not have to be tested.

b. The calculation as to whether the 80% of major source threshold was exceeded shall be based on records and procedures in Condition 5.9.2 and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by March 15.

c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there may be provisions for unit specific monitoring set forth in Section 7 of this permit.

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 Recordkeeping requirement for applicability determination

For non-major HAP (area) sources under 40 CFR Part 63, the Permittee should follow the requirements established by 40 CFR 63.10(b)(3) to support exempt status from 40 CFR Part 63 Subpart KK:

If an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without

considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112 (d) or (f), and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under this part) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the Administrator to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of this part for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under Section 112, if any. The requirements to determine applicability of a standard under 63.1(b)(3) and to record the results of that determination under paragraph (b)(3) of this section shall not by themselves create an obligation for the owner or operator to obtain a title V permit [40 CFR 63.10(b)(3)].

5.9.3 Records for HAP Emissions

a. The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.2, pursuant to Section 39.5(7)(b) of the Act.

b. If testing is required by Condition 5.7.2, the Permittee shall keep records of the testing, including the test date, conditions, methodologies, calculations, test results, and any discrepancies between the test results and formulation specifications of Condition 5.9.2(c) below.

c. The Permittee shall keep an MSDS or equivalent document showing the formulation of each ink, coating, fountain solution or cleanup solvent, including content of all HAPs. These formulation sheets may be used to make the calculation of HAP emissions required by Condition 5.7.2. If the formulation sheet uses a maximum or range value (e.g., less than 1% or range of 2 – 3%) then the highest value shall be used.

5.9.4 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.

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, 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. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

5.10.2 Annual Emissions Report

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

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source.

5.12 Source-Wide Compliance Procedures

5.12.1 General Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be based on the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

6.1 Emissions Reduction Market System (ERMS)

6.1.1 Description of ERMS

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

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. 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 in the sources’ CAAPP permits. These allotments are established from historical VOM emissions or “baseline emissions” lowered to provide the emissions reductions from stationary sources required for reasonable 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 transaction account to cover its actual VOM emissions during the preceding season. A transaction 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 transaction account database. The Illinois EPA will then retire ATUs in sources’ transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction 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 emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 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” (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.1.2 Applicability

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

6.1.3 Obligation to Hold Allotment Trading Units (ATUs)

a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.1.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.1.5.

   i. VOM emissions from insignificant emission 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 in Section 7.0 of 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 Condition 6.1.8(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 seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.1.4 Market Transactions

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.

6.1.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.1.3, 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 the 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 emissions 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 after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source’s next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.1.6 Quantification of Seasonal VOM Emissions

a. The methods and procedures specified in Sections 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 205.750(a), and shall be submitted in accordance with the following:

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

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

6.1.7 Annual Account Reporting

a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the 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 35 IAC 205.337;

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 is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions

attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.1.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 1,431 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 162.546 tons per season.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.1.10 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.

b. Contingent Allotments for New or Modified Emission Units

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

Emission Unit	Construction Permit No.	Date Issued
Lithographic Printing Press #5A Flexographic Printing Unit #8	01080015	2003
Lithographic Printing Press #2	99030028	1999

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

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 emissions 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.

6.1.9 Recordkeeping for ERMS

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

a. Seasonal component of the Annual Emissions Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.1.6(a); and

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

6.1.10 Exclusions from Further Reductions

a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [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 Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

None

b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Sheet-Fed Offset Lithographic Printing Presses

7.1.1 Description

Four sheet-fed non-heatset offset lithographic printing lines are used to print on boxboard and paperboard substrate. Infrared drying lights or hot and cold air knives are used to quicken the drying times of the inks, varnishes, and coatings.

Note: This narrative description is for informational purposes only and is not enforceable.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Sheet-Fed Offset Lithographic Printing Presses	Press #2	1999	None
	Press #3	1991	None
	Press #4	1990	None
	Press #5a	2003	None

7.1.3 Applicable Provisions and Regulations

a. An “affected lithographic printing press” for the purpose of these unit specific conditions is an emission unit described in Conditions 7.1.1 and 7.1.2 above.

b. The owner or operator of the affected lithographic printing presses shall not operate the printing lines unless the following conditions are complied with [35 IAC 218.407(a)]:

i. Fountain Solution

Cause or allow the operation of any sheet-fed offset lithographic printing line unless:

A. The VOM content of the as-applied fountain solution is 5 percent or less, by volume; or

B. The VOM content of the as-applied fountain solution is 8.5 percent or less, by volume, and the temperature of the fountain solution is maintained below 15.6^{o} C (60° F), measured at the reservoir or the fountain tray.

ii. Cleaning Solution

Cause or allow the use of a cleaning solution on any lithographic printing line unless:

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

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

iii. Cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored or disposed of in any manner other than in closed containers.

c. Each affected lithographic printing press is subject to 35 IAC 212.321(b)(1), which provides that:

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 (See also Attachment 2) [35 IAC 212.321(a)].

d. Each affected lithographic printing press is subject to the following requirements of 35 IAC 218.204(c):

No owner or operator shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to paper. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

kg/liter	lbs/gallon
0.28	2.3

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 composites.

e. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.1.4 Non-Applicability of Regulations of Concern

The affected lithographic printing presses are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected lithographic printing presses do not use an add-on control device to achieve compliance with the emission limitations or standards.

7.1.5 Control Requirements and Work Practices

Control requirements and work practices are not set for the affected lithographic printing presses.

7.1.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected lithographic printing presses are subject to the following:

a. Total VOM emissions from all affected lithographic printing presses combined (##2,3,4,5A) shall not exceed 15.0 tons/month and 74.5 tons/year.

   The above limitations were established in Permit 01080015, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203, and to make the emission reduction associated with the shutdown of presses #1 and #5 in 1999 permanent and enforceable [T1].

b. Total VOM emissions from the lithographic printing presses #2, #5A and flexographic printing press #8 combined shall not exceed 10 tons/month and 39.5 tons/year.

   The above limitations were established in Permit 01080015, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203, and to make the emission reduction associated with the shutdown of presses #1 and #5 in 1999 permanent and enforceable [T1].

c. VOM emissions from the affected lithographic printing press #2 shall not exceed 4.0 tons/month and 24.9 tons/year.

   The above limitations were established in Permit 99030028, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

d. 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].

7.1.7 Testing Requirements

a. The following testing procedures should be performed the lithographic printing as required by 35 IAC 218.409:

i. Testing to demonstrate compliance with the requirements of 35 IAC 218.407 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting such testing to allow the Agency to be present during such testing.

ii. Testing to demonstrate compliance with the VOM content limitations in 35 IAC 218.407(a)(1)(A), (a)(2), (a)(3) and (a)(4)(A), and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of 35 IAC 218.411(a)(1)(B)), shall be conducted upon request of the Illinois EPA, as follows:

A. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used, provided, however, Method 24 shall be used to demonstrate compliance; or

B. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a), provided, however, Method 24 shall be used to determine compliance.

iii. Testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 IAC 218.110.

b. The VOM content of coatings applied on the affected lithographic printing presses shall be determined according to USEPA reference Method 24 specified in 40 CFR 60 Appendix A, pursuant to 35 IAC 218.105(a).

7.1.8 Monitoring Requirements

a. Fountain Solution Temperature [35 IAC 218.410(a)]

A. The owner or operator of any lithographic printing line(s) relying on the temperature of the fountain solution to demonstrate compliance shall install, maintain, and continuously operate a temperature monitor of the fountain solution in the reservoir or fountain tray, as applicable.

B. The temperature monitor must be capable of reading with an accuracy of 1°C or 2°C, and must be attached to an automatic, continuous recording device such as a strip chart, recorder, or computer, with at least the same accuracy, that is installed, calibrated and maintained in accordance with the manufacturer's specifications. If the automatic, continuous recording device malfunctions, the owner or operator shall record the temperature of the fountain solution at least once every two operating hours. The automatic, continuous recording device shall be repaired or replaced as soon as practicable.

b. Fountain Solution VOM Content [35 IAC 218.410(b)]

The owner or operator of any lithographic printing line(s) subject to 35 IAC 218.407(a)(1)(A), (a)(2) or (a)(3) shall:

i. For a fountain solution to which VOM is not added automatically:

A. Maintain records of the VOM content of the fountain solution in accordance with 35 IAC 218.411(c)(2)(C); or

B. Take a sample of the as-applied fountain solution from the fountain tray or reservoir, as applicable, each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution in the fountain tray or reservoir, and shall determine compliance with the VOM content limitation of the as-applied fountain solution by using one of the following options:

1. With a refractometer or hydrometer with a visual, analog, or digital readout and with an accuracy of 0.5 percent. The refractometer or hydrometer must be calibrated with a standard solution for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications, against

measurements performed to determine compliance. The refractometer or hydrometer must be corrected for temperature at least once per 8-hour shift or once per batch of fountain solution prepared or modified, whichever is longer; or

2. With a conductivity meter if it is demonstrated that a refractometer and hydrometer cannot distinguish between compliant and noncompliant fountain solution for the type and amount of VOM in the fountain solution. A source may use a conductivity meter if it demonstrates that both hydrometers and refractometers fail to provide significantly different measurements for standard solutions containing 95 percent, 100 percent and 105 percent of the applicable VOM content limit. The conductivity meter reading for the fountain solution must be referenced to the conductivity of the incoming water. A standard solution shall be used to calibrate the conductivity meter for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications;

ii. For fountain solutions to which VOM is added at the source with automatic feed equipment, determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level. Records must be retained of the VOM content of the fountain solution in accordance with Section 218.411(c)(2)(D) of this Subpart. The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications.

c. Cleaning Solution [35 IAC 218.410(e)]

i. The owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with 35 IAC 218.407(a)(4)(A) must:

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

1. Install, operate, maintain, and calibrate the automatic feed equipment in

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

2. Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with 35 IAC 218.407(a)(4)(A).

B. For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) as set forth in 35 IAC 218.411(d)(2).

ii. The owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with 35 IAC 218.407(a)(4)(B) must keep records for such cleaning solutions used on any such line(s) as set forth in 35 IAC 218.411(d)(2)(C).

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected lithographic printing presses to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Collect and record the following information for each fountain solution [35 IAC 218.411(c)(2]:

i. The name and identification of each batch of fountain solution prepared for use on one or more lithographic printing lines, the lithographic printing line(s) or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch;

ii. If an owner or operator uses a hydrometer, refractometer, or conductivity meter, pursuant to 35 IAC 218.410(b)(1)(B), to demonstrate compliance with the applicable VOM content limit in 35 IAC 218.407(a)(1)(A), (a)(2), or (a)(3):

A. The date and time of preparation, and each subsequent modification, of the batch;

B. The results of each measurement taken in accordance with 35 IAC 218.410(b);

C. Documentation of the periodic calibration of

the meter in accordance with the manufacturer's specifications, including date and time of calibration, personnel conducting, identity of standard solution, and resultant reading; and

D. Documentation of the periodic temperature adjustment of the meter, including date and time of adjustment, personnel conducting and results.

iii. If the VOM content of the fountain solution is determined pursuant to 35 IAC 218.410(b)(1)(A), for each batch of as-applied fountain solution:

A. Date and time of preparation and each subsequent modification of the batch;

B. Volume and VOM content of each component used in, or subsequently added to, the fountain solution batch;

C. Calculated VOM content of the as-applied fountain solution; and

D. Any other information necessary to demonstrate compliance with the applicable VOM content limits in 35 IAC 218.407(a)(1)(A), (a)(2) and (a)(3), as specified in the source's operating permit.

iv. If the VOM content of the fountain solution is determined pursuant to Section 218.410(b)(2) of this Subpart, for each setting:

A. VOM content limit corresponding to each setting;

B. Date and time of initial setting and each subsequent setting;

C. Documentation of the periodic calibration of the automatic feed equipment in accordance with the manufacturer’s specifications; and

D. Any other information necessary to demonstrate compliance with the applicable VOM content limits in 218.407(a)(1)(A), (a)(2) and (a)(3), as specified in the source’s operating permit.

v. If the owner or operator relies on the temperature of the fountain solution to comply with the requirements in 35 IAC 218.407(a)(1)(A)(ii) or (a)(3)(B):

A. The temperature of the fountain solution at

each printing line, as monitored in accordance with 35 IAC 218.410(a); and

B. A maintenance log for the temperature monitoring devices and automatic, continuous temperature recorders detailing all routine and non-routine maintenance performed, including dates and duration of any outages;

b. For lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of 35 IAC 218.407 shall collect and record the following information for each cleaning solution used on each lithographic printing line [35 IAC 218.411(d)(2]:

i. For each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 IAC 218.407(a)(4)(A) and which is prepared at the source with automatic equipment:

A. The name and identification of each cleaning solution;

B. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 IAC 218.409(c);

C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);

D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;

E. The VOM content of the as-used cleaning solution, with supporting calculations; and

F. A calibration log for the automatic equipment, detailing periodic checks.

ii. For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with Section 218.407(a)(4)(A) of this Subpart, and which is not prepared at the source with automatic equipment:

A. The name and identification of each cleaning solution;

B. Date and time of preparation, and each subsequent modification, of the batch;

C. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with Section 218.409(c) of this Subpart;

D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and

E. The VOM content of the as-used cleaning solution, with supporting calculations.

iii. For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with 35 IAC 218.407(a)(4)(B):

A. The name and identification of each cleaning solution;

B. Date and time of preparation, and each subsequent modification, of the batch;

C. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with 35 IAC 218.409(e);

D. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and

E. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with 35 IAC 218.409(e).

iv. The date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any.

c. Monthly usage of ink, coating, and solvents in pounds or gallons.

d. The VOM content of each ink, coating, and solvent for affected printing presses in pounds/gallon or percent VOM.

e. Monthly and annual VOM emissions for each affected lithographic printing press and calculated based on the procedures established in Condition 7.1.12.

f. Total combined monthly and annual VOM emissions for all affected lithographic printing presses and calculated based on the procedures established in Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected lithographic printing presses with the permit requirements, 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. The Permittee shall notify the Illinois EPA in writing of any violation of 35 IAC 218.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation [35 IAC 218.411(d)(3)].

b. The Permittee shall notify the Illinois EPA Compliance Section of noncompliance of an affected lithographic printing press with the permit requirements within 30 days of the violation 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.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected lithographic printing presses.

7.1.12 Compliance Procedures

a. Compliance with emission limitations of Conditions 7.1.3(b) and 7.1.3(d) shall be based on the appropriate testing, monitoring and recordkeeping requirements as established in Conditions, 7.1.7, 7.1.8 and 7.1.9, respectively.

b. Compliance with emission limits of Conditions 5.6.1 and 7.1.6 shall be based on the following:

i. The Permittee may presume 95% retention of ink VOM in the printed substrate for non-heat offset lithographic presses, as stated in 35 IAC 218.411(a)(1)(B)(iii).

ii. Emissions and calculations for non-heatset offset lithographic printing lines shall be based on the following:

A. Ink VOM Emissions = Ink Usage x VOM Content x (0.05)

B. $$\text{Fountain Solution VOM Emissions} = \text{Fountain Solution Additive Usage} \times \text{VOM Content}$$

C. $$\text{Cleaning Solution VOM Emissions} = \text{Cleaning Solution Usage} \times \text{VOM Content}$$

D. For manual cleaning solution with a VOM composite partial vapor pressure less than 10 mmHg at 20 C the following equation may be used in place of the above cleaning solution emission determination method provided proper handling is performed as stated in Condition 7.2.3(b)(iii). This is stated in USEPA's Alternative Control Techniques Document Offset Lithographic Printing (EPA 453/R-94-054, June 1994):

$$\text{Cleaning Solution VOM Emissions} = \text{Cleaning Solution Usage} \times \text{VOM Content} \times 0.5$$

Reclaimed Solvent Emissions = Reclaimed Solvent (tons) x VOM Content (wt. %)

E. $$\text{Other VOM Emissions} = \text{Other Material Usage} \times \text{VOM Content}$$

F. Total VOM Emissions = Ink VOM Emissions + Fountain Solution VOM Emissions + Cleaning Solution VOM Emissions + Other VOM Emissions - Reclaimed Solvent Emissions.

Note: Additional credit for reclaimed cleaning solution is not allowed to be taken if the equation in 7.2.12(b)(iv) is used, because this equation takes into account this credit.

c. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.2 Rotogravure Printing Presses

7.2.1 Description

Two rotogravure printing presses are used to convert rolls of paper board into printed or non-printed die cut folding cartons.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Rotogravure Printing	Rotogravure Printing Press #9	1963	Cor Pak Thermal Oxidizer
	Rotogravure Printing Press #10	1973	Thermal Electron Thermal Oxidizer

7.2.3 Applicable Provisions and Regulations

a. An "affected rotogravure printing press" for the purpose of these unit specific conditions is the unit described in Conditions 7.2.1 and 7.2.2 above.

b. i. When control is not used [35 IAC 218.401(a)]:

No owner or operator of the affected rotogravure printing press shall apply at any time any coating or ink unless the VOM content does not exceed the following limitations:

A. 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

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

ii. When control is used [35 IAC 218.401(c)]:

No owner or operator of affected rotogravure printing press equipped with a capture system and control device shall operate the subject printing line unless the owner or operator meets the following requirements:

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

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

65 percent where a packaging rotogravure printing line is employed.

c. The affected rotogravure printing press #10 is subject to 35 IAC 212.321(b)(1), which provides that:

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 (See also Attachment 2) [35 IAC 212.321(a)].

d. The affected rotogravure printing press #9 is subject to 35 IAC 212.322(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

e. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.2.4 Non-Applicability of Regulations of Concern

a. The affected rotogravure printing presses are not subject to 35 IAC 218.301, Use of Organic Material because 35 IAC 218.402(b) exempts the affected printing lines from this regulation.

b. The New Source Performance Standard for Publication Rotogravure Printing, 40 CFR 60 Subpart QQ do not apply to the affected rotogravure printing presses because publication rotogravure printing is not being done on the affected printing lines.

c. The affected rotogravure printing presses are not subject to 35 IAC 218.204(c) Paper Coating, due to exemption clause of 35 IAC 218.204(c).

d. The affected rotogravure printing presses are not subject to 40 CFR Part 63 Subpart KK "National Emission Standards for the Printing and Publishing Industry" because the source is not a major source of HAP emissions pursuant to Condition 5.6.2.

7.2.5 Control Requirements and Work Practices

a. An afterburner combustion chamber operated in conjunction with either press #9 or press #10 shall be preheated to the manufacturer's recommended temperature but not lower than 1400^0F. This temperature shall be maintained during the printing/coating operations performed on these presses.

b. The Permittee shall follow good operating practices for the thermal oxidizer and incinerator, including periodic inspection, routine maintenance and repair of defects.

c. In the event of a natural gas outage, disruption or curtailment, Permittee is authorized to use propane as a substitute fuel.

d. These conditions are established pursuant to 39.5(7) of the Act.

7.2.6 Production and Emission Limitations

Production and emission limitations are not set for the affected rotogravure printing presses.

7.2.7 Testing Requirements

a. Emission Testing

i. Any required tests of volatile organic material emissions, including tests conducted to determine control equipment efficiency or control device destruction efficiency, for the affected printing lines shall be conducted in accordance with the methods and procedures specified in 35 IAC 218.105 [35 IAC 218.404].

ii. Upon request by the Illinois EPA, the Permittee of an affected printing line shall conduct emissions testing, at his own expense, to demonstrate compliance [35 IAC 218.401(c)(6)].

iii. A person planning to conduct a volatile organic material emissions test to demonstrate compliance with 35 IAC 218.401(c) shall notify the Illinois EPA of that intent not less than 30 days before the planned initiation of the tests so the Illinois EPA may observe the test.

b. Upon request by the Illinois EPA, the volatile organic material content of printing inks and coatings shall be determined by Method 24, 40 CFR 60, Appendix A, incorporated by reference in Section 218.105 [35 IAC 218.404(a)] USEPA Method 24 data sheets from the manufacturer are allowed if the coatings are applied as supplied from the manufacturer.

c. If the Permittee takes emission credit for VOM containing waste, the percent concentration of solvent shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste.

7.2.8 Monitoring Requirements

a. Compliance Assurance Monitoring (CAM) Requirements

The affected rotogravure printing presses are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 3, Table 1 pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment [40 CFR 64.7(a) and (b)].

b. The thermal oxidizer shall be equipped with continuous temperature indicators and strip chart recorders or disk storage for the combustion chamber temperatures [35 IAC 218.401(c)(5)].

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected rotogravure printing presses to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Daily control device monitoring data [35 IAC 218.404(e)(2)(A)].

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

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

d. Monthly usage of ink, coating, and solvents in pounds or

gallons.

e. Daily records of the afterburner's temperature chart recorder.

f. The VOM content of each ink, coating, and solvent in pounds/gallon or percent VOM.

g. The HAP content of each ink, coating, and solvent in pounds/gallon or percent HAP.

h. Total monthly and annual VOM and HAP emissions calculated based on the procedures established in Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected rotogravure printing presses with the permit requirements, 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. The Permittee shall notify the Illinois EPA Compliance Section of noncompliance of an affected printing line with the permit requirements within 30 days of the violation 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.

b. At least 30 calendar days before changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(c) to 35 IAC 218.401(a) or (b), the Permittee shall certify compliance for such new methods in accordance with the requirements of the certification reports of Condition 9.8 within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that the affected printing line(s) will be in compliance with the applicable requirements of 35 IAC 218.401 and the requirements of this permit [35 IAC 218.404(c)(3)(B)].

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected rotogravure printing presses.

7.2.12 Compliance Procedures

a. Compliance with Conditions 7.1.3(b) is addressed by the continuous combustion temperature monitoring of Condition 7.1.8, emission testing in accordance with Condition 7.1.7 and the recordkeeping required by Condition 7.1.9.

b. Compliance with emission limits shall be determined using

the emission formulas listed below:

i. Uncontrolled mode:

VOM Emissions = Material Usage (inks, coatings, etc.) X VOM Content

ii. $$\text{VOM Emissions from Ink \& Coating Usage} = \text{Ink \& Coating Usage} \times \text{VOM Content} \times \left(1 - \text{Overall Control Efficienty}\right)$$

iii. $$\text{VOM Emissions from Cleanup Solution} = \text{Cleanup Solution Consumption} \times \text{VOM Content}$$

c. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.3 Flexographic Printing Press

7.3.1 Description

Movable flexographic printing unit is a single color printing station using water-based flexographic inks. The press is moved and mounted on different equipment depending on type of job performed.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Flexographic Printing Press	Movable Press #8	2003	None

7.3.3 Applicable Provisions and Regulations

a. An "affected flexographic printing press" for the purpose of these unit specific conditions is the unit described in Conditions 7.3.1 and 7.3.2 above.

b. The affected flexographic printing press is subject to 35 IAC 212.321(b)(1), which provides that:

   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 (See also Attachment 2) [35 IAC 212.321(a)].

c. No owner or operator of the affected flexographic printing press shall apply at any time any coating or ink unless the VOM content does not exceed the following limitations [35 IAC 218.401(a)]:

   A. 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

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

d. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.3.4 Non-Applicability of Regulations of Concern

a. The affected flexographic printing press is not subject to 35 IAC 218.301, Use of Organic Material because 35 IAC 218.402(b) exempts the affected printing lines from this regulation.

b. The affected flexographic printing press is not subject to 35 IAC 218.204(c) Paper Coating, due to exemption clause of 35 IAC 218.204(c).

c. The affected flexographic printing press is not subject to 40 CFR Part 63 Subpart KK "National Emission Standards for the Printing and Publishing Industry" because the source is not a major source of HAP emissions pursuant to Condition 5.6.2.

d. The affected flexographic printing press is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because this unit does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.3.5 Control Requirements and Work Practices

At all times, the Permittee shall, to the extent practicable, maintain and operate the affected unit, in a manner consistent with good air pollution control practice for minimizing emissions.

This condition is established pursuant to 39.5(7) of the Act.

7.3.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected flexographic printing press is subject to the following:

a. Only water-based printing and coating shall be performed on the affected unit.

b. Total amount of ink, coating and VOM solvent used in the affected unit shall not exceed 3.6 tons/month and 35.7 tons/year.

c. Total VOM emissions from the lithographic printing presses #2, #5A and the affected flexographic printing press #8 combined shall not exceed 10 tons/month and 39.5 tons/year.

The above limitations were established in Permit 01080015, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major

source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203, and to make the emission reduction associated with the shutdown of presses #1 and #5 in 1999 permanent and enforceable [T1].

d. 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).

7.3.7 Testing Requirements

Upon reasonable request by the Illinois EPA, the VOM content of specific inks, coatings, and cleaning solvents used on the affected unit 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)].

7.3.8 Monitoring Requirements

Specific monitoring requirements are not set for the affected flexographic printing press.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected flexographic press to demonstrate compliance with Conditions 5.6, 7.3.3 and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee shall collect and record all of the following information for the affected unit [35 IAC 218.404(c)(2)]:

   i. The name and identification number of each coating and ink as applied on the affected unit; and

   ii. The VOM content of each coating and ink as applied each day on the affected unit.

b. The Permittee shall maintain of the VOM content of each cleaning solvent used on the affected unit 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 each cleaning solvent used on the affected press on a monthly basis.

c. The Permittee shall collect and record all of the following information and maintain the information at the source for a period of five years:

   i. Total usage of each ink, coating, cleaning solvents, and any other VOM containing materials on a monthly and annual basis in terms of pounds per month and tons per year;

   ii. The VOM content of each cleaning solvents and/or any other VOM containing materials used in terms of % VOM by weight with basis, accompanied by a copy of the supporting information, e.g., supplier data sheet or laboratory analysis report; and

   iii. Total VOM emissions from the affected unit calculated in accordance with the procedures given in Condition 7.3.12, on a monthly and annual basis in terms of pounds per month and tons per year.

d. The Permittee shall keep records of the aggregate annual VOM emissions (with supporting calculations) from the affected flexographic press #8 and lithographic presses #2/#5A, as addressed by Condition 7.3.6(c). Emissions for each group of presses shall be calculated in accordance with compliance procedures established in Condition 7.1.12 and Condition 7.3.12, respectively.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected assembly stations 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. On and after a date consistent with 35 IAC 218.106, the owner or operator of a subject printing line shall notify the Illinois EPA in the following instances [35 IAC 218.404(c)(3):

   i. Any record showing violation of Section 218.401(a) of this Part shall be reported by sending a copy of such record to the Agency within 30 days following the occurrence of the violation.

   ii. At least 30 calendar days before changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(a) to 35 IAC 218.401(b) or (c), the owner or operator shall comply with all requirements of 35 IAC 218.401(d)(1) or (e)(1), respectively.

b. The Permittee shall notify the Illinois EPA Compliance

Section of noncompliance of an affected flexographic printing press with the permit requirements within 30 days of the violation 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.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected flexographic printing press.

7.3.12 Compliance Procedures

a. Compliance with emission limitations of Condition 7.3.3(c) shall be based on the appropriate testing and recordkeeping requirements as established in Conditions 7.3.7 and 7.3.9, respectively.

b. Compliance with emission limitation in Condition 7.3.6 shall be determined by using formulas listed below for affected unit:

VOM Emissions = Material Usage x VOM Content

c. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.4 Aerators

7.4.1 Description

Aerators are used to align printed sheets on a pallet. Loose offset spray powder may be blown off sheets.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Aerators	Aerators #1 and #2	1979;1987	None

7.4.3 Applicable Provisions and Regulations

a. An “affected aerator” for the purpose of these unit specific conditions is a unit as described in Conditions 7.4.1 and 7.4.2 above.

b. Each affected aerator is subject to 35 IAC 212.321(b)(1), which provides that:

   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 (See also Attachment 2) [35 IAC 212.321(a)].

c. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.4.4 Non-Applicability of Regulations of Concern

The affected aerators are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these units do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.4.5 Control Requirements and Work Practices

Control requirements and work practices are not set for the affected aerators.

7.4.6 Production and Emission Limitations

Production and emission limitations are not set for the affected aerators.

7.4.7 Testing Requirements

Testing requirements are not set for the affected aerators.

7.4.8 Monitoring Requirements

Specific monitoring requirements are not set for the affected aerators.

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected aerators to demonstrate compliance with Condition 5.6, pursuant to Section 39.5(7)(b) of the Act:

a. Total offset spray powder applied (consumed) in associated printing department (t/mo and t/yr);

b. Total hours of operation for the affected aerators #1 and #2 (hr/yr); and

c. PM emissions calculated in accordance with compliance procedures of Condition 7.4.12 and supporting calculations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected aerators 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:

Emissions of PM from the affected aerators in excess of the limits specified in Condition 7.4.3(b) and 7.4.3(c) within 30 days of such occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected aerators.

7.4.12 Compliance Procedures

a. Compliance with the PM emission limits of Conditions 7.4.3(b) and (c) shall be based on the recordkeeping requirements of this subsection emission calculations described further in this paragraph.

b. Compliance with the emission limits in Conditions 5.6 is addressed by the records required in Condition 7.4.9, the formulas and assumptions listed below:

i. Assumptions

A. Amount of powder lost (escaped through the hoods) at the printing department – 25% of total powder used;

B. Amount of powder lost (escaped through the hoods) by affected aerators – 25% of total powder reached aerators

ii. PM Emission Calculations

Total Annual Emissions, ton = (P – P1) x 0.25

Where:

P = total amount of powder used
P1 = amount of powder lost at the printing department

Hourly Emissions, lb = Annual Emissions (ton) x 2000 lbs/ton x 1 yr/ Operating Hours

c. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.5 Boilers

7.5.1 Description

Two natural gas fired boilers (firing rate 16.74 mmBthu/hr each) are used to heat the folding carton facility and provide hot water for sinks and restrooms.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Boilers	Boilers #1 and #2	1962	None

7.5.3 Applicable Provisions and Regulations

a. An “affected boiler” for the purpose of these unit specific conditions is a unit as described in Conditions 7.5.1 and 7.5.2 above.

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

c. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.5.4 Non-Applicability of Regulations of Concern

a. Each affected boiler is not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides From Existing Fuel Combustion Emission Sources in Major Metropolitan Areas, because the actual heat input of each boiler is less than 73.2 MW (250 mmBtu/hr).

b. Pursuant to 35 IAC 218.303, any fuel combustion emission unit is not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.

c. This permit is issued based on the affected boilers not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected boilers do not use an add-on control devices to achieve compliance with an emission limitation or standard.

7.5.5 Control Requirements and Work Practices

Each affected boiler shall only be operated with natural gas as the fuel, except as stated in Condition 7.5.11 further.

7.5.6 Production and Emission Limitations

Production and emission limitations are not set for the affected boilers.

7.5.7 Testing Requirements

Testing requirements are not set for the affected boilers.

7.5.8 Monitoring Requirements

Monitoring requirements are not set for the affected boilers.

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Conditions 5.6, pursuant to Section 39.5(7)(b) of the Act:

a. Total natural gas consumption (mmscf/month or therms/month and mmscf/yr or therms/yr) for the affected boilers.

b. Annual emissions of regulated air pollutants as calculated in accordance with compliance procedures in Condition 7.5.12.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected boilers 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:

Emissions from the affected boilers in excess of the limits specified in Condition 5.6 within 30 days of such occurrence.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

In the event of a natural gas outage, disruption or curtailment, Permittee is authorized to use propane as a substitute fuel.

7.5.12 Compliance Procedures

a. Compliance with Conditions 7.5.3(b) and (c) is achieved by the proper operation, as required by Condition 7.5.5.

b. Compliance with the emission limits in Conditions 5.6 is addressed by the records required in Condition 7.5.9 and the emission factors and formulas listed below:

Natural Gas Mode

Pollutant	Emission Factor ($lb/10^6 ft^3$)
PM	7.6
NO_x	100.0
CO	84
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, March 1998.

Emissions(lb) = natural gas consumed multiplied by the appropriate emission factor.

7.6 Finishing Department

7.6.1 Description

In the finishing department folding, gluing, windowing, and otherwise completing manufacturing of folding cartons to customer specifications is performed.

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Finishing Department	Final operations in manufacturing folding cartons	1974	None

7.6.3 Applicable Provisions and Regulations

a. An “affected finishing department” for the purpose of these unit specific conditions is a unit as described in Conditions 7.6.1 and 7.6.2 above.

b. The affected finishing department is subject to 35 IAC 212.321(b)(1), which provides that:

   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 (See also Attachment 2) [35 IAC 212.321(a)].

c. The owner or operator shall not cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any affected emission unit [35 IAC 218.301]. If no odor nuisance exists this limitation shall apply only to photochemically reactive material.

d. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.6.4 Non-Applicability of Regulations of Concern

a. The requirements of 35 IAC 218 Subpart PP do not apply to the affected finishing department because the VOM emissions

from the affected finishing department are below the applicability levels of Subpart PP.

b. This permit is issued based on the affected finishing department not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected finishing department does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.6.5 Control Requirements and Work Practices

Control requirements and work practices are not set for affected finishing department.

7.6.6 Production and Emission Limitations

Production and emission limitations are not set for affected finishing department.

7.6.7 Testing Requirements

Upon reasonable request by the Illinois EPA, the VOM content of glues used in the affected finishing department be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A. USEPA Method 24 data sheets from the manufacturer are allowed if the coatings are applied as supplied from the manufacturer.

7.6.8 Monitoring Requirements

Monitoring requirements are not set for affected finishing department.

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected finishing department to demonstrate compliance with Condition 5.6, pursuant to Section 39.5(7)(b) of the Act:

a. Annual glue usage (lbs/yr).

b. VOM content of glue used, lbs/gal or weight percent.

c. Hourly VOM emissions calculated in accordance with compliance procedures of Condition 7.6.12.

d. Total annual VOM emissions calculated in accordance with compliance procedures of Condition 7.6.12.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected finishing department 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:

Emissions of VOM from the affected finishing department in excess of the limits specified in Condition 7.6.3(c) within 30 days of such occurrence.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected finishing department.

7.6.12 Compliance Procedures

a. Compliance with Condition 7.6.3(c) shall be achieved by considering VOM emissions calculated in accordance with Condition 7.6.12(b) and hours of operation recorded in accordance with recordkeeping requirements of Condition 7.6.9 (c).

b. VOM emissions from the finishing department shall be determined using the following:

VOM Emissions = Glue Usage x VOM Content

c. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.7 Parts Washer

7.7.1 Description

The PRI parts washer cleans ink covered parts from the printing presses in the Gravure Department. Solvent is used as the cleaning agent.

7.7.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Parts Washer	Progressive Recovery, Inc. Parts Washer	1990	None

7.7.3 Applicable Provisions and Regulations

a. An “affected parts washer” for the purpose of these unit specific conditions is an emission unit described in Conditions 7.7.1 and 7.7.2 above.

b. The affected parts washer is subject to operating procedures and equipment requirements established in 35 IAC 218.182 and described further in this subsection.

c. The owner or operator shall not cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any affected emission unit [35 IAC 218.301]. If no odor nuisance exists this limitation shall apply only to photochemically reactive material.

d. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.7.4 Non-Applicability of Regulations of Concern

a. The National Emission Standards for Halogenated Solvent Cleaning 40 CFR 63 Subpart T do not apply because halogenated cleaning solutions are not being used on the affected parts washer.

b. 35 IAC 218.182(c) Material Requirements for Cold Cleaning does not apply because the affected parts washer is classified as a substantial equivalent to the Detrex cold batch degreaser pursuant to 35 IAC 218.182(g).

c. This permit is issued based on the affected parts washer not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected parts washer does not use an add-on control devices to achieve compliance with an emission limitation or standard.

7.7.5 Control Requirements and Work Practices

a. Operating Procedures: No person shall operate an affected parts washer unless [35 IAC 218.182(a)]:

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 affected parts washer is closed when parts are not being handled; and

iii. Parts are drained until dripping ceases.

b. Equipment Requirements: No person shall operate an affected parts waster unless [35 IAC 218.182(b)]:

i. It is equipped with a cover which is closed whenever parts are not being handled in 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°C (100°F);

B. The solvent is agitated; or

C. The solvent is heated above ambient room temperature.

ii. The affected parts washer 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°C (100°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 affected parts washer 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 Illinois EPA and further processed consistent with 35 IAC 218.108. Such a system may include a water cover, refrigerated chiller, or carbon absorber.

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

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

c. i. No solvent shall be used in the affected parts washer that contains more than 5 percent by weight of the following halogenated materials:

Methylene Chloride
Perchloroethylene
Trichloroethylene
1,1,1 Trichloroethane
Carbon Tetrachloride
Chloroform

ii. This condition is established in order to exempt the Permittee from the requirements of 40 CFR 63 Subpart T National Emission Standards for Halogenated Solvent Cleaning.

7.7.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected parts washer is subject to the following:

Emissions and operation of the affected parts washer shall not exceed the following limits:

Net Solvent Consumption		VOM Emissions	
(pounds/month)	(tons/year)	(pounds/month)	(tons/year)
8,300	25.1	8,300	25.1

These limits are based on maximum solvent usage and material

balance.

The above limitations were established in Permit 95090022, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

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].

7.7.7 Testing Requirements

a. If the Permittee wants emission credit for VOM containing waste, the percent concentration of VOM shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Methods 8260, or by using USEPA Method 24 of 40 CFR 60, Appendix A.

b. The condition described above is established in accordance with provisions 39.5(7) of the Act.

7.7.8 Monitoring Requirements

Monitoring requirements are not set for the affected parts washer.

7.7.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected fuel combustion emission units to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Solvent usage (gal/mo and gal/yr).

b. VOM content (wt.%) in the applied solvent.

c. VOM content (wt. %) of VOM containing waste sent off-site as determined by Condition 7.7.7, if applicable.

d. Annual emissions of VOM as calculated in accordance with compliance procedures in Condition 7.7.12.

e. Records of the test and analysis results required by Condition 7.7.7.

f. List of solvents used for verifying compliance with Condition 7.7.5(c).

7.7.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations 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. Production and emission limits for the affected parts washer in excess of the limits specified in Condition 7.7.6 and 7.7.3 within 30 days of such occurrence.

b. Application of the solvents described in Condition 7.7.5(c) within 30 days of such occurrence.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected fuel combustion emission units.

7.7.12 Compliance Procedures

a. Compliance with limitation of Condition 7.7.3(c) shall be achieved by the recordkepping requirements of Condition 7.7.9.

b. Compliance with the emission limits in Condition 5.6 and Condition 7.7.6 is addressed by the records required in Condition 7.7.9 and the formulas listed below:

VOM Emissions = (Actual Solvent Usage (gal) x Average Solvent Density (lb/gal) x VOM Content of the Solvent (wt. %) - [VOM Containing Waste (gal/mo) x Waste Density (lb/gal) x VOM Content in Waste (wt. %)];

c. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

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 ……, 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 that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. 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. This notice shall:

i. Describe the physical or operational change;

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

iii. 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;

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

v. 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 if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of 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 Conditions 8.6.3 and 8.6.4.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA every six months as follows, unless more frequent submittal of

such reports is required in Sections 5 or 7 of this permit [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	July 31
July - December	January 31

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 determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;

e. The test method(s) that 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. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.

b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency
Bureau of Air
Compliance & Enforcement Section (MC 40)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
Bureau of Air
Air Quality Planning Section (MC 39)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

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

iv. USEPA Region 5 - Air Branch

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

c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
1021 North Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

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.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

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, pursuant to Section 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

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, or 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 this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [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 there under.

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 as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (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 applicable requirements; or

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

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; 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 authorized by this permit.

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. At 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 including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a 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, Air Quality Planning 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 annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Unit, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

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 and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 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 [Section 39.5(7)(k) of the Act]:

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.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

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 [Section 39.5(7)(k)(iv) of the Act].

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, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

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 that inaccurate statement were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

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

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 and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) 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. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the 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

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

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

10.0 ATTACHMENTS

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: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

10.1.1 Process Emission Units for Which Construction or Modification Commenced Prior to April 14, 1972

a. 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 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)].

b. The emissions of particulate matter into the atmosphere in any one hour period from the affected unit shall not exceed the allowable emission rates specified in the following equation:

$$E = C + A\,(P)^{B}$$

Where:

P = Process weight rate

E = Allowable emission rate

i. 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

ii. For process weight rates in excess of 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

c. Limits for Process Emission Units for which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.5	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

10.1.2 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

a. 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)].

b. The emissions of particulate matter into the atmosphere in any one hour period from the affected

coating lines shall not exceed the allowable emission rates specified in the following equation:

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

Where:

P = Process weight rate

E = Allowable emission rate

i. For process weight rates of 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

ii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.3 Attachment 3 - Compliance Assurance Monitoring (CAM) Plan

Table 1 - PSEU	
Designation:	Rotogravure Printing Presses #9 and #10
Pollutant:	VOM, HAP

Indicators:	#1: Chamber Temperature	#2: Work Ptactice

GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	The combustion chamber temperature is monitored by a thermocouple	Inspection and maintenance of the burner and thermocouples
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	> 1400°F	Annual inspection
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	N/A	N/A

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	The sensor is located in the afterburner's chamber. The tolerance of the thermocouple at 1400^0 F is ± 10.5^0 F. The chart recorder minor division is 50^0F.	N/A
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	The function of the chart is checked daily	N/A
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Accuracy of the thermocouple is verified annually by using NIST certified calibrator 1045E	N/A
THE MONITORING FREQUENCY:	Continuous	Annual inspection of the burner
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Recorded continuously on a circular chart recorder	Documented results of annual inspections and repairs
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	No averaging is taken	N/A

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

www.epa.state.il.us/air/caapp/199-caapp.pdf
www.epa.state.il.us/air/permits/197-fee.pdf

AB:psj