217/782-2113

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

PERMITTEE

Teepak, LLC
Attn: John Ramsey
915 North Michigan
Danville, Illinois 61832

Application No.: 95120326 I.D. No.: 183804AAL
Applicant's Designation: Date Received: December 6, 1995
Operation of: Cellulose Casing Manufacturing Plant
Date Issued: January 8, 2002 Expiration Date[2]: January 8, 2007
Source Location: 915 North Michigan, Danville, Vermilion County
Responsible Official: Douglas Cunningham, Plant Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a cellulose casing 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 Dan Punzak at 217/782-2113.

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

DES:DGP:psj

cc: Illinois EPA, FOS, Region 3

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

2 Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Teepak, LLC
915 North Michigan Avenue
Danville, Illinois 61832
217/446-6460

I.D. No.: 183804AAL
Standard Industrial Classification: 3089, Plastic Products, Not Elsewhere Classified

1.2 Owner/Parent Company

Teepak, LLC
1011 Warrenville Road, Suite 255
Lisle, Illinois 60532

1.3 Operator

Teepak, LLC
915 North Michigan Avenue
Danville, Illinois 61832

John Ramsey
217/444-8248

1.4 General Source Description

The Teepak, LLC manufacturing plant is located at 915 North Michigan in Danville. The source manufactures cellulose casing which is used for making meat products. In addition, the source does printing on the casings, has several storage tanks produces heat using boilers, and operates a wastewater treatment plant.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
HAP	Hazardous Air Pollutant
hr	hour
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
kW	kilowatts
lb	pound
mmBtu	Million British thermal units
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
ppm	parts per million
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 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:

Viscose Ripening and Delivery System Tanks
Sulfuric Acid Unloading and Storage Tank
Mineral Oil Unloading and Storage Tank
Carbon Disulfide Unloading and Pressurized Storage Tanks
Anhydrous Cooling Tower
Acid Recovery Cooling Tower
Bleach System – Tanks and Pumps
Waste Compactor

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:

"A" Tanks System – Coagulation Acids
Coal Filters, Pressurized Packed Bed Acid Filters
Air Compressors
Dye Make-Up Systems
Hazardous Waste Accumulation Building
Sulfide Treatment System
Scrubber Spent Solution Tanks
Vat Dye System
Zip and Securex Make-Up System

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

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

Equipment used for the melting or application of less than 50,000 lbs/year of wax to which no organic solvent has been added [35 IAC 201.210(a)(7)].

Equipment used for filling drums, pails, or other packaging containers, excluding aerosol cans, with soaps, detergents, surfactants, lubricating oils, waxes, vegetable oils, greases, animal fats, glycerin, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(8)].

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)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

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

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn

syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

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

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 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182.

3.2.2 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. 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.

3.2.3 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 do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

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 Constructed	Emission Control Equipment
#1 W/P P/M	Wienie-Pak Process Machine #1	1987	Scrubber (PCD1)
#2 W/P P/M	Wienie-Pak Process Machine #2	1976	Scrubber (PCD2)
#3 W/P P/M	Wienie-Pak Process Machine #3	1972	Scrubber (PCD3)
#4 W/P P/M	Wienie-Pak Process Machine #4	1988	Scrubber (PCD4)
#5 W/P P/M	Wienie-Pak Process Machine #5	1962	Scrubber (PCD5)
#6 W/P P/M	Wienie-Pak Process Machine #6	1962	Scrubber (PCD6)
#7A W/P P/M	Wienie-Pak Process Machine #7A	1990	Scrubber (PCD7A)
#8 P/M	Miscellaneous/Wienie-Pak Process Machine #8	1966	Scrubber (PCD8)
#9 Fibrous P/M	Fibrous Process Machine #9	1967	Scrubber (PCD9)
#10 Fibrous P/M	Fibrous Process Machine #10	1968	Scrubber (PCD10)
#10.5 R & D P/M	R & D Experimental Machine #10.5	1976	None
#11	Baratte System (Batch Vessels)	1957	Scrubber (PCDC)
#12	East and West Chemical Basements[b]	1961	Scrubber (PCDC)
#13	Acid Recovery	1957	Scrubber (PCDC)
#14	Anhydrous System Wet Processing Tanks	1970	None
#15	Anhydrous System Silo	1970	Wet Scrubber #225 (AE1-PCD)
#16	Anhydrous System Dryer	1970	Wet Scrubber #220 (AE2-PCD)
17	W/P Press #1	1996	None
18	W/P Press #2	1996	None
19	Three Boilers BH1 BH2 BH3	 1957 1970 1965	None
20	Lagoon Inlet Mixing Basin, LA1	1984	None
21	Lagoon	1957	None
22	Lagoon Outlet Mixing Basin, LA2	1984	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.2 Applicable Regulations

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

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

a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

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

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

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

5.2.3 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.

5.2.4 Risk Management Plan

a. This stationary source, as defined in 40 CFR Section 68.3, is subject to 40 CFR Part 68, the Accidental Release Prevention regulations [40 CFR 68.215(a)(1)].

b. The owner or operator of a stationary source shall revise and update the RMP submitted, as specified in 40 CFR 68.190.

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC 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 40 CFR Part 70 or 71.

b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

c. This stationary source will be subject to 40 CFR Part 63, Subpart UUUU, when such rule becomes final and effective. The Permittee shall comply with the applicable requirements of such regulation by the date(s) specified in such regulation and shall certify compliance with the applicable requirements of such regulation as part of the annual compliance certification required by 40 CFR Part 70 or 71 beginning in the year that compliance is required under a final and effective rule.

5.2.6 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, 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.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.7 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels. Specifically, the H_2S scrubbers must have a CAM plan.

5.3 Non-Applicability of Regulations of Concern

5.3.1 This permit is issued based on the affected processes not being subject to 35 IAC 218 or 219, because the affected source is not located in the Chicago or Metro-East areas.

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	2,314.76
Sulfur Dioxide (SO_2)	42.00
Particulate Matter (PM)	27.30
Nitrogen Oxides (NO_x)	174.00
HAP, not included in VOM or PM	----
Total	2,558.06

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.2 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, 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.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 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.

5.6.3 Odor Complaint Tracking System

a. The Permittee shall develop a program to address odor complaints, either received directly from citizens or indirectly from the Illinois EPA. Each complaint shall be entered in a log with the complainants name (if given), location (if known), the date and time, windspeed and direction, and general description of weather, e.g., temperature, and cloud condition.

b. The Permittee shall identify and investigate emission units which may be the cause of the odor complaint to determine the level of operation of the unit, the condition of the unit and any control system, and indications whether or not the unit is contributing to the odor complaint. The results of this investigation shall also be recorded in a log. If any unit is identified as contributing to the complaint due to improper operation or malfunction, the Permittee shall also specify the actions taken to alleviate the immediate problem and remedial actions taken to prevent further occurrences.

c. The Permittee shall submit an annual report to the Illinois EPA's Field Operations Section in Collinsville of all complaints received during the previous year and the information required by Condition 5.6.3(b). This annual report shall be submitted prior to or with the Annual Emission Report required by Condition 9.7. If no complaints were received during the reporting year, a statement to that effect shall be included in the Annual Emission Report.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source 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.

Unless otherwise specified in the permit, notification included in the semiannual reports will be considered as meeting this requirement.

5.7.2 Annual Emissions Report

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

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, regarding the type and amount of HAP emissions from the source. This shall be submitted with the Annual Emission Report required by Condition 5.7.2

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VOM Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit. Changes to the emission factors can be made pursuant to approval by the Illinois EPA.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit Cellulose Casing Process Machines Control Caustic Scrubbers

7.1.1 Description

The production of casing from viscose is discussed first here because the accounts for the majority of emissions, but the raw material for this process is the viscose process discussed in Section 7.2. In the viscose process carbon disulfide (CS_2) reacts with alkali cellulose to form cellulose xanthate, which is soluble in dilute caustic. The viscous solution is called “viscose”. Extrusion of viscose into a dilute acid solution causes the regeneration of cellulose and CS_2 and the formation of hydrogen sulfide (H_2S). A majority of the H_2S is removed by a caustic scrubber, but CS_2 is not removed. CS_2 is a HAP as well as a VOM. Some ammonia is released during the extrusion step.

There are eleven process machines. Ten are normal production units which have a scrubber. One unit is a small experimental unit and does not have a scrubber. Of the 10 production units, seven are called Wienie-Pak units, two are fibrous units in which the viscose is applied to a hemp fiber. The final unit is miscellaneous/Wienie-Pak.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
#1 W/P P/M	Wienie-Pak Process Machine #1	Scrubber (PCD1)
#2 W/P P/M	Wienie-Pak Process Machine #2	Scrubber (PCD2)
#3 W/P P/M	Wienie-Pak Process Machine #3	Scrubber (PCD3)
#4 W/P P/M	Wienie-Pak Process Machine #4	Scrubber (PCD4)
#5 W/P P/M	Wienie-Pak Process Machine #5	Scrubber (PCD5)
#6 W/P P/M	Wienie-Pak Process Machine #6	Scrubber (PCD6)
#7A W/P P/M	Wienie-Pak Process Machine #7A	Scrubber (PCD7A)
#8 P/M	Miscellaneous/Wienie-Pak Process Machine #8	Scrubber (PCD8)
#9 Fibrous P/M	Fibrous Process Machine #9	Scrubber (PCD9)
#10 Fibrous P/M	Fibrous Process Machine #10	Scrubber (PCD10)

Emission Unit	Description	Emission Control Equipment
#10.5 R & D P/M	R & D Experimental Machine #10.5	None

7.1.3 Applicability Provisions and Applicable Regulations

a. An “affected casing process machine” for the purpose of these unit-specific conditions, is a machine for converting a viscose solution into a casing by use of an extruder and chemical reaction. The machines that do this at this source are identified in Condition 7.1.2.

b. Each affected process machine is subject to the emission limits identified in Condition 5.2.2.

c. Each affected process machine is subject to 35 IAC 215.301. This rule requires that emissions not exceed 8 lb/hr if the VOM is photochemically reactive pursuant to the definition in 35 IAC 211.4690 or there is an odor nuisance. The VOM in this process is not photochemically reactive and there currently is no odor nuisance attributable to these emission units. The option for 85% control as specified in 35 IAC 215.302 is not applicable because the control equipment for this process removes only H_2S, not the VOM being emitted by this process.

d. Malfunction and Breakdown Provisions

In the event of a malfunction or breakdown of a scrubber, the Permittee is authorized to continue operation of the process machine while bypassing the inoperable scrubber in violation of the applicable requirement of Condition 7.1.6, as necessary to prevent risk of injury to personnel or severe damage to equipment. This authorization is subject to the following requirements:

i. The Permittee shall repair the damaged feature(s) of the scrubber or begin an orderly shutdown of the process machine within 72 hours or the Permittee obtains an extension, for up to 48 more hours, from the Illinois EPA. The request for such an extension must document that the part that caused the breakdown did not have an in-stock spare and specify a schedule of actions the Permittee will take that will assure the feature(s) will be repaired or the process machine will be shutdown as soon as possible.

ii. The Permittee shall fulfill the applicable recordkeeping and reporting requirements of Conditions 7.1.9(b) and 7.1.10(a).

7.1.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected process machines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for VOM emissions, because the affected process machines do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Control Requirements and Work Practices

a. Each scrubber on each process machine shall have a design efficiency of 90% removal of H_2S and be operated in accordance with the manufacturer's instruction and good maintenance practices.

b. Cellulose casing Process Machines 7A, 8, 9, and 10 and associated chemical process equipment, shall be operated using the conventional viscose chemical process, as described in the application or an enhanced process, as approved by the Illinois EPA.

7.1.6 Emission Limitations

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

a. The emissions of carbon disulfide (CS_2) from Process Machine 7A shall not exceed 68 pounds per hour. It should be noted that this limit does not address associated chemical process equipment.

b. The emissions of CS_2 from Process Machines 8, 9, and 10 shall not exceed the following limits. It should be noted that this limit does not address emissions from associated chemical process equipment.

Process Machine	CS_2 Emissions (Lb/Day)
8	1,600
9	1,985
10	1,951

Conditions 7.1.6(a) and (b) and 7.1.5(b) represent the application of the Best Available Control Technology as required by Section 165 of the Clean Air Act and established in the Construction

Permit/PSD Approval for Process Machines 7A, 8, 9, and 10.

c. i. Emissions of carbon disulfide (CS_2) from Process Machine 7A shall not exceed 1,632 pounds per day and 25.3 tons per month, and 289 tons per year.

ii. Emissions of hydrogen sulfide (H_2S) from Process Machine 7A shall not exceed 1.4 pounds per hour, after the emissions control device.

iii. Emissions of H_2S attributed to Process Machines 8, 9, and 10 shall not exceed 3.8 pounds per hour, total, after the emissions control device.

d. i. Plant process emissions of CS_2 shall not exceed 6.5 tons per day and 2,200 tons per year. This includes associated chemical process equipment but not LA1 and LA2, and fugitive emissions from the lagoons (see Section 7.5).

ii. Plant emissions of H_2S shall not exceed 15 pounds per hour and 66 tons per year, excluding LA1 and LA2 and lagoon fugitive emissions.

e. This permit is issued based on negligible emissions of volatile organic compounds, other than CS_2 from the cellulose plant, i.e. cellulose casing process machines and associated chemical process equipment. For this purpose emissions of such materials shall not exceed nominal emission rates of 1.0 lb/hour and 4.4 ton/yr.

f. Compliance with all annual limits above shall be determined from a running total of 365 days of data. [T1].

The above limitations were established in Permits 94060064 and 97090100, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits were established as part of a major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.1.7 Testing Requirements

Upon request by the Illinois EPA, the emissions of carbon disulfide and hydrogen sulfide from any or all of the process machines or scrubbers shall be tested within a

reasonable time using the test method approved by the Illinois EPA in 1991 or standard USEPA test methodology, unless another method is approved by the Illinois EPA: Refer to 40 CFR 60, Appendix A, and 40 CF 61, Appendix B, for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4
Volatile Organic Material	USEPA Method 25, 25A if outlet VOM cont. < 50 ppmv as C Non CH_4
Hydrogen Sulfide And Carbon Disulfide	USEPA Method 15

7.1.8 Monitoring Requirements

a. Each H_2S scrubber shall be equipped with a continuous monitor for differential pressure across each scrubber to reasonably assure that each H_2S scrubber is operating correctly. (i.e., between 0.2 and 4.0 inches water column)

b. The Permittee shall maintain and operate H_2S monitors on the four stacks through which the various hydrogen sulfide scrubbers discharge. These monitors shall be operated pursuant to written procedures to obtain continuous measurements to verify the proper operation of each of the H_2S scrubbers.

c. For purposes of 7.1.8(a) and (b), continuous is defined as the monitor and associated recorder operating 90% of the time that the scrubber is operating, calculated on a monthly basis.

d. On a monthly basis the efficiency of H_2S removal by the scrubbers shall be determined. For this test, tubes that indicate concentration of H_2S may be used on the scrubber inlet and outlet. Monthly means a minimum of 12 times in a calendar year and no more than 35 days between tests.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected process machine and/or control device to demonstrate compliance with Conditions 5.5.1, 7.1.3 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

a. Number of viscose batches used in the process machines and CS_2 pounds per batch yielding viscose

consumption in lbs/hr. Consumption must be separate for machines 1-6, 7A, 8, 9 and 10.

b. Calculated daily VOM and H_2S emissions using the emission factors in Condition 7.1.12. Separate records for machines 1-6, 7A, 8, 9 and 10.

c. Monthly and annual VOM and H_2S emissions. Separate records for machines 1-6, 7A, and 8-10.

d. Differential pressure drop across each scrubber (continuous).

e. Readings of H_2S monitors on four stacks (ppm).

f. Results of monthly tests for scrubber H_2S removal efficiency.

g. Records for Malfunctions and Breakdowns of Scrubbers

The Permittee shall maintain records, pursuant to 35 IAC 201.263, of continued operation of a process machine subject to hourly H_2S limits in Condition 7.1.6 during malfunctions and breakdown of the control features of the scrubber, which as a minimum, shall include:

i. Date and duration of malfunction or breakdown;

ii. A detailed explanation of the malfunction or breakdown;

iii. An explanation why the damaged feature(s) could not be immediately repaired or the associated process machines removed from service without risk of injury to personnel or severe damage to equipment;

iv. The measures used to reduce the quantity of emissions and the duration of the event;

v. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity; and

vi. The amount of release above typical emissions during malfunction/breakdown.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected process machine 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. Emissions exceeding any of the limits in Conditions 7.1.6.

b. Reporting of Malfunctions and Breakdowns for the Caustic Scrubbers

The Permittee shall provide the following notification and reports to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to 35 IAC 201.263, concerning continued operation of a process machine subject to Condition 7.1.3(c) during malfunction or breakdown of the control features of the scrubber.

i. The Permittee shall notify the Illinois EPA's regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence of noncompliance due to malfunction or breakdown.

ii. Upon achievement of compliance, the Permittee shall give a written follow-up notice to the Illinois EPA, Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation of the process machine was necessary, the length of time during which operation continued under such conditions, the measures taken by the Permittee to minimize and correct deficiencies with chronology, and when the repairs were completed or when the process machine was taken out of service.

iii. If compliance is not achieved within 5 working days of the occurrence, the Permittee shall submit interim status reports to the Illinois EPA, Compliance Section and Regional Field Office, within 5 days of the occurrence and every 14 days thereafter, until compliance is achieved. These interim reports shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to occur with schedule, and the expected date on which repairs will be complete or the process machine will be taken out of service.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

a. Compliance with the limits specified in Condition 7.1.6 shall be based on the recordkeeping and reporting requirements of Conditions 7.1.8 and 7.1.9 and the following emission factors.

b. Emissions of CS_2 and H_2S shall be estimated from plant specific emission factors related to production as follows, until such time as further testing is conducted in accordance with Condition 7.1.7:

CS_2 Emissions = (0.7473 lb CS_2 Emissions/lb CS_2 Used) x (lb CS_2 Used For Process)

Process Machine H_2S Emissions = (30 lb H_2S Emissions/Viscose Batch) x [1 – (Removal Efficiency/100)] x (Viscose Batches)

Plant H_2S Emissions = (34 lb H_2S emissions/viscose batch) x [1 – (Removal Efficiency/100)] x (Viscose Batches)

For removal efficiency the value determined by the H_2S efficiency tests required by Condition 7.1.8(d) shall be used.

c. Compliance with Condition 7.1.3(c) and 7.1.6(e) is considered to be assured by the inherent nature of the operation, that is, no other use of VOM containing materials.

7.2 Unit: Chemical Department
Control: Scrubbers

7.2.1 Description

The chemical department is the part of the operation that prepares the “viscose” to feed to the process machines described in Section 7.1 and then recovers materials after process machines.

A material called sodium cellulose xanthate is prepared in batch vessels such as makeup tanks, slurry vessels, dissolvers and blenders from a combination of cellulose material such as wood pulp, sodium hydroxide and carbon disulfide.

In the process machines sulfuric acid is used which neutralizes the hydroxide and results in sodium sulfate, which is recovered, along with excess acid. The recovery vessels are in an area called a “chemical” basement.

Although the majority of the carbon disulfide and hydrogen sulfide are emitted by the process machines, some of them are emitted in the chemical processing steps.

Ammonia is released during the acid recovery step.

The final recovered sodium sulfate is a hydrated salt. Thus the scrubber on that system is preventing PM emissions while the PCDC scrubber is for H_2S (a gas) removal.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
#11	Baratte Systems[a] (Batch Vessels)	Scrubber (PCDC)
#12	East and West Chemical Basements[b]	Scrubber (PCDC)
#13	Acid Recovery	Scrubber (PCDC)
#14	Anhydrous System Wet Processing Tanks	None
#15	Anhydrous System Silo	Wet Scrubber #225 (AE1-PCD)
#16	Anhydrous System Dryer	Wet Scrubber #220 (AE2-PCD)

[a] Two vents go directly to atmosphere but majority of vented air is ducted through the indicated scrubber.

[b] Each system consists of several tanks/processing vessels which vent through two ventilation systems. Both ventilation systems go to one scrubber.

7.2.3 Applicability Provisions and Applicable Regulations

a. The “affected chemical department process” for the purpose of these unit-specific conditions, is a process for preparing the raw materials for the process machines discussed in Section 7.1 or processes and recovers materials from the same machines.

b. Each affected chemical department process is subject to the emission limits identified in Condition 5.2.2.

c. Each affected process machine is subject to 35 IAC 216.301. This rule requires that emissions not exceed 8 lb/hr if the VOM is photochemically reactive pursuant to the definition in 35 IAC 211.4690 or there is an odor nuisance. The VOM in this process is not photochemically reactive and there currently is no odor nuisance attributable to these emission units. The option for 85% control as specified in 35 IAC 215.302 is not applicable because the control equipment for this process removes only H_2S, not the VOM being emitted by this process.

d. Although each emission unit is subject to 35 IAC 212.322(b) it is only meaningful for the silo and dryer (Emission Units #15 and #16) and their associated control equipment because they are the only units which emit PM. This rule applies to process emission units which were existing prior to April 14, 1972.

This rule states that no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing process emission unit, 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 the following equation:

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

Where:

P = Process weight rate;

E = Allowable emission rate; and,

i. For process weight rate up to 30 ton/hour:

	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 rate in excess of 30 ton/hour:

	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

iii. For a process weight rate under 100 lb/hr (0.05 tons), the allowable is 0.55 lb/hr.

e. Malfunction and Breakdown Provisions

In the event of a malfunction or breakdown of the PCDC scrubber, the Permittee is authorized to continue operation of the chemical department and acid recovery process, as necessary to prevent risk of injury to personnel or severe damage to equipment. This authorization is subject to the following requirements:

i. The Permittee shall repair the damaged feature(s) of the scrubber or remove the chemical department and acid recovery process from service as soon as practicable. This shall be accomplished within 8 hours unless the feature(s) can not be repaired within 8 hours and the emission units can not be removed from service within 8 hours, and the Permittee obtains an extension, for up to two days, from the Illinois EPA. The request for such an extension must document that repair parts are unavailable and specify a schedule of actions the Permittee will take that will assure the feature(s) will be repaired or the emission units are shutdown as soon as possible.

ii. The Permittee shall fulfill the applicable recordkeeping and reporting requirements of Conditions 7.2.9(b) and 7.2.10(a).

7.2.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected process machines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for VOM emissions, because the affected process machine does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.2.5 Control Requirements and Work Practices

a. The scrubber on the Baratte systems, chemical basements and acid recovery (Emission Units #12, #13, and #14) shall have a design efficiency of 90% removal of H_2S and be operated in accordance with the manufacturer's instruction and good maintenance practices.

b. The wet scrubbers on the silo and dryer shall be operated to reduce PM emissions so as to comply with 35 IAC 212.322(b). See Condition 7.2.3(d).

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected Emission Units #11 to #16 are subject to the following:

Although there are no specific limits for the emission units listed in Condition 7.2.2, Condition 7.1.6(d) and (e) include limits that include combined emissions from these units as well as those units in Condition 7.1.6.

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.2.7 Testing Requirements

Upon request by the Illinois EPA, the emissions of carbon disulfide and hydrogen sulfide from any or all of the Baratte system vessels, vessels in the East or West chemical basements, or the acid recovery system or scrubbers shall be tested within a reasonable time using standard USEPA test methodology, or the test method approved by the Illinois EPA in 1991, unless another method is approved by the Illinois EPA: Refer to 40 CFR 60, Appendix A, and 40 CF 61, Appendix B, for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3

Moisture	USEPA Method 4
Volatile Organic Material	USEPA Method 25, 25A if outlet VOM cont. < 50 ppmv as C Non CH_4
Hydrogen Sulfide and Carbon Disulfide	USEPA Method 15

7.2.8 Monitoring Requirements

a. The H_2S scrubber shall be equipped with a continuous monitor for differential pressure across the scrubber to reasonably assure that each H_2S scrubber is operating correctly. (i.e., between 0,.2 and 4.0 inches water column)

b. The Permittee shall maintain and operate an H_2S monitor on the stack through which the hydrogen sulfide scrubber discharges. The monitor shall be operated pursuant to written procedures to obtain continuous measurements to verify the proper operation of the H_2S scrubber.

c. For purposes of 7.2.8(a) and (b), continuous is defined as the monitor and associated recorder operating 90% of the time that the scrubber is operating, calculated on a monthly basis.

d. On a monthly basis the efficiency of H_2S removable the PCDC scrubber shall be determined. For this test, tubes that indicate concentration of H_2S may be used on the scrubber inlet and outlet. Monthly means a minimum of 12 times in a calendar year and no more than 35 days between tests.

7.2.9 Recordkeeping Requirements

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

a. Number of batches of viscose prepared (batches/day);

b. Differential pressure drop across the scrubber;

c. Readings of H_2S monitors on the scrubber stack (ppm);

d. Results of monthly tests for scrubber H_2S removal efficiency;

e. The daily VOM and H_2S emissions calculated in Section 7.1.12 include emissions from this chemical

processing, but do not include emissions from baratte stacks B1 and B2;

f. Monthly and annual VOM and H2S emissions; and

g. Records for malfunctions and breakdowns of the PCDC scrubber.

The Permittee shall maintain records, pursuant to 35 IAC 201.263, of continued operation of the chemical department or acid recovery process during malfunctions and breakdown of the control features of the PCDC scrubber, which as a minimum, shall include:

i. Date and duration of malfunction or breakdown;

ii. A detailed explanation of the malfunction or breakdown;

iii. An explanation why the damaged feature(s) could not be immediately repaired or the units removed from service without risk of injury to personnel or severe damage to equipment;

iv. The measures used to reduce the quantity of emissions and the duration of the event;

v. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity; and

vi. The amount of release above typical emissions during malfunction/breakdown.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected chemical department or acid recovery process 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:

Reporting of Malfunctions and Breakdowns for the PCDC scrubber

The Permittee shall provide the following notification and reports to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to 35 IAC 201.263, concerning continued operation of an emission unit vented to the scrubber subject to Condition 7.2.3(c) during malfunction or breakdown of the control features of the unit.

a. The Permittee shall notify the Illinois EPA's regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence of noncompliance due to malfunction or breakdown.

b. Upon achievement of compliance, the Permittee shall give a written follow-up notice to the Illinois EPA, Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation of the emission units were necessary, the length of time during which operation continued under such conditions, the measures taken by the Permittee to minimize and correct deficiencies with chronology, and when the repairs were completed or when the unit was taken out of service.

c. If compliance is not achieved within 5 working days of the occurrence, the Permittee shall submit interim status reports to the Illinois EPA, Compliance Section and Regional Field Office, within 5 days of the occurrence and every 14 days thereafter, until compliance is achieved. These interim reports shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to occur with schedule, and the expected date on which repairs will be complete or the units will be taken out of service.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected chemical department without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Although in the description wood pulp was cited as the source of cellulose, there may be other materials used as that raw material that do not increase emissions.

7.2.12 Compliance Procedures

a. Compliance is assured by proper operation of the control equipment and the recordkeeping requirements of Condition 7.2.9 and the reporting requirements of Condition 7.2.10.

b. Emissions from baratte stacks B1 and B2 are based upon 0.26 pounds.

c. i. Emissions of PM from wet scrubber #225 on the silo shall be calculated as 1.0 lb/hour. This calculation is based on uncontrolled PM emissions of 28.3 lb/hr and a scrubber efficiency of 96.5%.

ii. Emissions of PM from west scrubber #220 on the dryer shall be calculated as 1.47 lb/hr. This calculation is based on uncontrolled emissions of 209 lb/hr and a scrubber efficiency of 99.3%.

7.3 Unit: Two W/P Presses #1 and #2
Control: None

7.3.1 Description

Flexographic printing is performed on some of the casings produced elsewhere in the plant.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
17	W/P Press #1	None
18	W/P Press #2	None

7.3.3 Applicability Provisions and Applicable Regulations

a. An “affected W/P Press” for the purpose of these unit-specific conditions, is a flexographic press used for printing on casings made in the equipment described in Section 7.1. The two presses are identified in Condition7.3.2.

b. Each affected press is subject to the emission limits identified in Condition 5.2.2.

c. Each affected process machine is subject to 35 IAC 215.301. This rule requires that emissions not exceed 8 lb/hr if the VOM is photochemically reactive pursuant to the definition I 35 IAC 211.4690 or there is an odor nuisance. Compliance with this rule is assured since each press is only capable of emitting 3.1 lb/hr.

7.3.4 Non-Applicability of Regulations of Concern

b. This permit is issued based on the affected presses not being subject to the New Source Performance Standards (NSPS) for Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR Part 60, Subpart QQ, because the affected printing presses are classified as flexographic presses on plastic products and Subpart QQ only applies to rotogravure presses for publications.

c. This permit is issued based on the affected presses not being subject to 35 IAC 215.401, because the affected printing presses are limited in Condition 7.3.6 to VOM emissions o 17.1 tons/yr and Section 215.401 only applies if VOM emissions exceed 1,000 tons/yr.

d. This permit is issued based on the affected presses not being subject to 40 CFR Part 63, Subpart KK,

because the affected printing presses are not publication or product and packaging rotogravure presses and are not wide-web flexographic presses.

a. This permit is issued based on the affected presses not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected presses are not subject to an emission limitation or standard for the applicable regulated air pollutant and does not use an add-on control device.

7.3.5 Control Requirements or Production Limits

None

7.3.6 Emission Limitations

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

Emissions from the affected two presses combined shall not exceed the following limits:

VOM in Printing Materials[a]		VOM Emissions	
(Lb/Mo)	(Ton/Yr)	(Lb/Mo)	(Ton/Yr)
4,200	17.1	4,200	17.1

[a] Including those in inks as received, solvents added, catalysts and cleanup solvents. Net value after subtracting off credits for wastes shipped offsite. Waste credits may be apportioned to “monthly” figure based on days of operation if waste shipments are not made monthly.

These limits are based on a combined machine capability of 6.2 lb/hr and 5,520 hr/yr of operation but neither is a specific limit.

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

The above limitations were established in Permit 96050108, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). 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 the federal rules

for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.3.7 Operating Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

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

a. VOM and HAP content of each ink, solvent and cleanup solvent used (wt. % or lb/gal).

b. Ink, solvent and cleanup solvent usage (lb or gal/mo).

c. VOM content and quantity of waste shipped offsite for calculation of any waste credit.

d. VOM and HAP emissions.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected press 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:

VOM emissions exceed the limits in Condition 7.3.6.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

a. Compliance shall be determined from the recordkeeping requirements of Condition 7.3.9.

b. Monthly VOM emissions shall be determined by the sum for all inks:

Ink Usage (gal or lb/mo) x VOM Content (lb/gal or wt. %) + Solvent Usage (gal or lb/mo) x VOM Content (lb/gal or wt. %) - Waste Credit

7.4 Unit: Fuel Combustion Units
Control:

7.4.1 Description

Three boilers provide steam for the plant. The boilers primarily burn natural gas but are capable of burning #2 fuel oil. Only one fuel is used at a time.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description		Firing Rate (mmBtu/Hr) Gas	Oil	Emission Control Equipment
19	Three Boilers BH1, BH2, BH3	BHl	90.4	84.8	None
		BH2	98.5	91.6	
		BH3	99.5	9.49	

7.4.3 Applicability Provisions and Applicable Regulations

a. An affected boiler for the purpose of these unit specific conditions is a steam generating unit that is fired with natural gas, with distillate fuel backup, with a maximum heat input capacity of 100 mmBtu/hr or less and constructed prior to June 9, 1989. As of the “date issued” as shown page 1 of this permit, the affected boilers are identified in Condition 7.4.2.

b. i. The emissions of particulate matter (PM) into the atmosphere in any one hour period shall not exceed 0.15 kg/MW-hr (0.10 lb/mmBtu) of actual heat input from any fuel combustion emission unit (affected boiler) using liquid fuel exclusively [35 IAC 212.206].

ii. The emission of carbon monoxide (CO) into the atmosphere from any affected boiler with actual heat input greater than 2.9 MW (10 mmBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air. [35 IAC 216.121]

c. The emission of sulfur dioxide (SO_2) into the atmosphere in any one hour period from any affected boiler burning liquid fuel exclusively shall not exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lb/mmBtu) [35 IAC 214.122(b)(2)].

d. Each affected boiler is also subject to the opacity limits identified in Condition 5.2.2(b).

7.4.4 Non-Applicability of Regulations of Concern

a. Each affected boiler is not subject to 35 IAC 217.141, because the actual heat input of the affected boiler is less than 73.2 MW (250 mmBtu/hr).

b. Pursuant to 35 IAC 215.303, each affected boiler, i.e., fuel combustion emission unit, is not subject to 35 IAC 218.301, Use of Organic Material.

c. There are no applicable requirements for particulate matter or sulfur dioxide for affected boilers firing natural gas.

d. This permit is issued based on the affected boilers not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected boilers use a passive control measure, such as a low-polluting fuel, that is not considered a control device because it acts to prevent the pollutants from forming.

e. This permit is issued based on the affected boilers not being subject to the NSPS, 40 CFR 60 Subpart Dc, because the units were construction prior to June 9, 1989.

7.4.5 Operational and Production Limits and Work Practices

a. Each affected boiler shall only be fired by natural gas or distillate fuel oil as the fuels.

b. The Permittee shall not use distillate fuel oil (Grades No. 1 and 2 fuels) in the affected boilers with a sulfur content greater than the larger of the following two values:

i. 0.28 weight percent, or

ii. The wt. percent given by the formula:

Maximum wt. percent sulfur = (0.000015) x (Gross heating value of oil, Btu/lb).

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5.1, the affected boilers are subject to the following:

None

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1, 5.5.3 and 7.4.5 pursuant to Section 39.5(7)(b) of the Act:

a. For affected boilers,

i. Total natural gas usage for affected boilers (ft^3/mo);

ii. Total distillate fuel usage for affected boilers (gal/mo);

iii. The maximum sulfur content (in Wt.%) for each shipment of distillate fuel oil used in the affected boilers;

iv. Fuel oil supplier certification, including

A. The name of the oil supplier.

B. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil found at 40 CFR 60.41c.

b. Annual aggregate NO_x, PM, SO_2, and VOM emissions from the affected boilers, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

a. If there is an exceedance of sulfur content of distillate fuel oil in excess of the limit specified in Condition 7.4.5, the Permittee shall submit a report within 30 days after receipt of a noncompliant shipment of distillate fuel oil.

b. Annual emissions of NO_x, PM, SO_2, or VOM from the affected boilers in excess of the limits specified in Condition 5.5.1.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

a. Compliance with Condition 7.4.3(b)(i) and (ii) is demonstrated under inherent operating conditions of an affected boiler, so that no compliance procedures are set in this permit addressing this requirement.

b. Compliance with Condition 7.4.3(c) is demonstrated under inherent operating conditions of affected boilers fired by distillate oil with a sulfur content meeting the specification of Condition 7.4.5(b), so that no compliance procedures are set in this permit addressing this regulation.

c. Compliance with the emission limits in Conditions 5.5.1 and 5.5.3 shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

i. Emissions from the boilers burning natural gas shall be calculated based on the following emission factors:

Pollutant	Emission Factor ($lb/10^6 ft^3$)
PM	1.9
SO_2	0.6
VOM	5.5
NO_x	100

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, Volume I, Fifth Edition, March 1998.

Boiler Emissions (ton) = natural gas consumed multiplied by the appropriate emission factor/2000.

ii. Emissions from the affected boilers burning distillate fuel oil shall be calculated based on the following emission factors:

Pollutant	Emission Factors ($lb/10^3$ gallon)
PM	2
NO_x	20
SO_2	142%S
VOM	0.34

These are the emission factors for uncontrolled distillate fuel oil combustion in commercial/institutional/residential combustors, Tables 1.3-1, 1.3-3 and 1.3-7, AP-42, Volume I, Fifth Edition, September 1998. "%S" indicates that the weight % of sulfur in the oil should be multiplied by the value given.

Boiler Emissions (ton) = distillate fuel oil consumed (gallons) multiplied by the appropriate emission factor/2000.

iii. Total emissions for each pollutant are to be determined by combining the results of Conditions 7.2.12(i) and (ii) for all affected boilers.

7.5 Unit: Wastewater Treatment Plant
Control: None

7.5.1 Description

Wastewater from the plant is treated with caustic or sulfuric aid to bring it into an acceptable pH range. The lagoon is a fugitive emission unit. Some ammonia is released at the lagoon.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
20	Lagoon Inlet Mixing Basin, LA1	None
21	Lagoon	None
22	Lagoon Outlet Mixing Basin, LA2	None

7.5.3 Applicability Provisions and Applicable Regulations

a. An “affected lagoon mixing basin or lagoon” for the purpose of these unit-specific conditions, is part of a wastewater treatment plant and identified in Condition 7.5.2.

b. Each affected mixing basin is subject to 35 IAC 215.301. This rule requires that emissions not exceed 8 lb/hr if the VOM is photochemically reactive pursuant to the definition in 3 IAC 211.4690 or there is an odor nuisance. The VOM in this process is not photochemically reactive and there currently is no odor nuisance attributable to these emission units.

7.5.4 Non-Applicability of Regulations of Concern

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

7.5.5 Control Requirements

None

7.5.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.5.7 Operating Requirements

None

7.5.8 Inspection Requirements

None

7.5.9 Recordkeeping Requirements

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

a. Gallons of water treated (gal/mo); and

b. VOM and H_2S emissions (lb/mo).

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected unit 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.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

a. The WATER8 computer program is acceptable for determining VOM emissions from the lagoons.

b. LA1 and LA2 emissions of CS_2 and H_2S shall be determined based on monthly sampling using gas tubes.

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 November 14, 2001 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

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 except as otherwise specified in the 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 Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

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

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

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

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

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

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

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

8.6.3 Test Reports

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

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

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

c. The date any analyses were performed;

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

e. The test and analytical methodologies used;

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

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

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

8.6.4 Reporting Addresses

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

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

iii. Illinois EPA - Air Permit Section

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

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

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

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

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

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

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

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

e. Obtain and remove samples of any discharge or emission of pollutants 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. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit 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 Section, 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 [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Normally, an act of God such as lightning or flood is considered an emergency;

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

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

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

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

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

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

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.2 Attachment 2 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;

2. Minor Permit Modification; and

3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment

- Corrects typographical errors;
- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- Requires more frequent monitoring or reporting by the Permittee;
- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

    - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and

    - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.

- Are not modifications under any provision of Title I of the CAA;

- Are not required to be processed as a significant permit modification; and

- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

- The source's suggested draft permit/conditions;

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.

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

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	ID number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information

1. Source name:		
2. Source street address:		
3. City:		4. Zip code:
5. Is the source located within city limits? ☐ Yes ☐ No		
6. Township name:	7. County:	8. ID number:

Owner Information

9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)

14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information

19. Who is the applicant? ☐ Owner ☐ Operator	20. All correspondence to: (check one) ☐ Owner ☐ Operator ☐ Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	☐ Yes ☐ No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	☐ Yes ☐ No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	☐ Yes ☐ No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	☐ Yes ☐ No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	☐ Yes ☐ No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	☐ Yes ☐ No ☐ Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.

30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.

Authorized Signature:

_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.4 Attachment 4 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.

2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.

3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.

4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.

5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.

6. Information addressing any outstanding transfer agreement pursuant to the ERMS.

7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.

9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.html.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506

Springfield, Illinois 62794-9506