217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Bag Makers, Inc.
Attn: Jeremy Bayness
6606 South Union Road
Union, Illinois 60180

Application No.: 03070014
Applicant's Designation:
Subject: Packaging Printing Plant
Date Issued: June 5, 2012
Location: 6606 South Union Road, Union, McHenry County

I.D. No.: 111804AAD
Date Received: December 19, 2011

Expiration Date: June 5, 2022

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of twenty-one (21) flexographic printing presses, thirty-three (33) silk screen printing presses, and natural gas fired heaters and dryers pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This federally enforceable state operating permit is issued:

i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.

ii. To limit the emissions of VOM from the construction of new emission units and other modifications at the source, which occurred without first obtaining construction permit(s) between November 15, 1992 and June 15, 2005 (the period during which the Chicago area was classified as severe nonattainment for ozone), to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification.

iii. To limit emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year to less than 15 tons. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205, except reporting requirements of 35 Ill. Adm. Code 205.300 which are described in Attachment B.

iv. To establish federally enforceable production and operating limitations, which restrict the potential to emit for VOM to less than 25 tons per year so that the source is not subject to the requirements of 35 Ill. Adm. Code 218.401 (Flexographic and Rotogravure Printing).

b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.

c. This permit supersedes all operating permit(s) for this location.

2a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.

b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

3. Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

4a. Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012, except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations that use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, “cleaning operation” means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;

b. Pursuant to 35 Ill. Adm. Code 218.187(b), no owner or operator of a source subject to 35 Ill. Adm. Code 218.187, other than manufacturers of coatings, inks, adhesives, or resins, shall perform any cleaning

operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in 35 Ill. Adm. Code 218.187(b)(1), (b)(2), or (b)(3). No owner or operator of a source that manufactures coatings, inks, adhesives, or resins shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in at least one of the following subsections: 35 Ill. Adm. Code 218.187(b)(1), (b)(2), (b)(3), (b)(4), or (b)(5).

i. The VOM content of the as-used cleaning solutions does not exceed the following emissions limitations:

Cleaning of ink application equipment:

	kg/l	lb/gal
Screen printing, including screen reclamation activities	0.5	4.2

or

ii. The VOM composite vapor pressure of each as-used cleaning solution used does not exceed 8.0 mmHg measured at 20°C (68°F);

c. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.

5a. This permit is issued based upon the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK. The flexographic printing presses operated at the facility are not wide-web flexographic printing presses, as defined in 40 CFR 63.822(a).

b. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ. Pursuant to 40 CFR 63.3300(c), web coating lines in lithography, screen-printing, letterpress, and narrow-web flexographic printing processes are not part of the affected source under 40 CFR 63 Subpart JJJJ.

6a. Pursuant to 35 Ill. Adm. Code 218.187(a)(2)(B)(i), notwithstanding 35 Ill. Adm. Code 218.187(a)(1):

i. The following cleaning operations shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (e), (f), and (g):

A. Stripping of cured coatings, inks, or adhesives, including screen reclamation activities;

B. Cleaning operations in printing pre-press areas, including the cleaning of film processors, color scanners, plate processors, film cleaning, and plate cleaning;

ii. Cleaning operations for emission units within the following source categories shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (e), (f), and (g);

A. Flexible package printing;

B. Paper, film, and foil coating;

b. This permit is issued based upon the source not being subject to the requirements of 35 Ill. Adm. Code 218.204(c)(3), the Paper Coating, because no paper coating operations are performed on the printing presses.

c. This permit is issued based upon the source not being subject to the requirements of 35 Ill. Adm. Code 218.401 (Flexographic and Rotogravure Printing) as a result of the federally enforceable production and operating limitations of this permit, which restrict the maximum theoretical emissions of VOM from this facility to less than 100 tons per year and the potential to emit for VOM emissions to less than 25 tons per year. Pursuant to 35 Ill. Adm. Code 218.402(a), except as otherwise provided in 35 Ill. Adm. Code 218.401, the limitations of 35 Ill. Adm. Code 218.401 apply to all flexographic and rotogravure printing lines at a subject source. Sources with flexographic and/or rotogravure printing lines are subject sources if:

i. Total maximum theoretical emissions of VOM from all flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines) at the source ever exceed 90.7 Mg (100 tons) per calendar year and the flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines) at the source are not limited to less than 90.7 Mg (100 tons) of VOM emissions per calendar year in the absence of air pollution control equipment through production or capacity limitations contained in a federally enforceable permit or a SIP revision; or

ii. The flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines) at the source have a potential to emit 22.7 Mg (25 tons) or more of VOM per year.

d. Pursuant to 35 Ill. Adm. Code 218.402(b), the limitations of 35 Ill. Adm. Code 218.401(d) shall apply to all owners or operators of flexographic or rotogravure printing lines that print flexible

packaging, or that print flexible packaging and non-flexible packaging on the same line, at a source where the combined emissions of VOM from all flexographic and rotogravure printing lines total 6.8 kg/day (15 lbs/day) or more (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines), in the absence of air pollution control equipment.

e. This permit is issued based on the silk screen printing presses not being subject to the control requirements of 35 Ill. Adm. Code 218 Subpart TT (Other Emission Units). Pursuant to 35 Ill. Adm. Code 218.980(d), no limits under 35 Ill. Adm. Code 218 Subpart TT shall apply to emission units with emissions of VOM to the atmosphere less than or equal to 2.3 Mg (2.5 tons) per calendar year if the total emissions from such emission units not complying with 35 Ill. Adm. Code 219.986 does not exceed 4.5 Mg (5.0 tons) per calendar year.

7a. Pursuant to 35 Ill. Adm. Code 218.187(c), the owner or operator of a subject source shall demonstrate compliance with 35 Ill. Adm. Code 218.187 by using the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.187(g) and by complying with the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.187(e).

b. Pursuant to 35 Ill. Adm. Code 218.187(d), the owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 218.187 shall comply with the following for each subject cleaning operation. Such requirements are in addition to work practices set forth in 35 Ill. Adm. Code 218.187(b)(4) and (b)(5), as applicable:

i. Cover open containers and properly cover and store applicators used to apply cleaning solvents;

ii. Minimize air circulation around the cleaning operation;

iii. Dispose of all used cleaning solutions, cleaning towels, and applicators used to apply cleaning solvents in closed containers;

iv. Utilize equipment practices that minimize emissions; and

v. When using cleaning solvent for wipe cleaning, sources that manufacture coatings, inks, adhesives, or resins shall:

A. Cover open containers used for the storage of spent or fresh organic compounds used for cleanup or coating, ink, adhesive, or resin removal; and

B. Cover open containers used for the storage or disposal of cloth or paper impregnated with organic compounds that are used for cleanup or coating, ink, adhesive, or resin removal.

8a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to

minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

b. The heaters and dryers shall only be operated with natural gas as the fuel. The use of any other fuel in the heaters or dryers requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.

9a. Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205.

b. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period.

10a. Operation of and emissions from the flexographic printing presses and the silk screen printing presses shall not exceed the following limits:

i. VOM emissions from fifteen flexographic printing presses (FP1 - FP15) and ten silk screen printing presses (SP1 - SP10) constructed before June 15, 2005 shall not exceed 0.5 ton/week and 23.86 tons/year.

ii. VOM emissions from twenty-one flexographic printing presses shall not exceed 0.45 ton/week and 22.89 tons/year.

iii. The above limitations are being established in this permit pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the affected flexographic printing presses and silk screen printing presses below the levels that would trigger the applicability of these rules.

iv. Compliance with the annual limits of Condition 10(a) shall be determined on a weekly basis from the sum of the data for the current week plus the preceding 51 weeks (running 52 weeks total).

b. Emissions from thirty-three silk screen printing presses (SP1 – SP33) shall not exceed the following limits:

Emission Units	VOM Usage (Tons/Mo)	VOM Usage (Tons/Yr)	VOM Emissions (Tons/Mo)	VOM Emissions (Tons/Yr)
Silk Screen Presses SP1 - SP10	0.1	0.97	0.1	0.97
Silk Screen Presses SP11 - SP33	0.4	3.45	0.4	3.45
			Total:	4.42

These limits are based on the maximum VOM usage and emissions. Note that there is a "nested" limit on the emissions of the combination of HAPs as a result of the limit on VOM emissions. The HAPs emitted at this source have been determined to be VOMs and therefore limiting VOM emissions also limits HAP emissions.

c. VOM and HAP emissions from printing operations shall be determined from the following equation:

$$E = [\Sigma(M_i \times C_i) - W \times C_w]$$

where:

E = VOM or HAP emissions (tons);

M_i = Raw material usage (tons);

C_i = VOM or HAP content of the raw material ((% by weight);

W = Certified amount of waste shipped-off (tons);

C_w = Certified VOM or HAP content of the waste (% by weight).

d. Operations and emissions from the natural gas-fired heaters and dryers shall not exceed the following limits:

i. Natural Gas Usage: 20 mmscf/month, 100 mmscf/year

ii. Emissions from the combustion of natural gas:

Pollutant	Emission Factor ($lbs/10^6$ scf)	Emissions (Tons/Mo)	Emissions (Tons/Yr)
Carbon Monoxide (CO)	84	0.84	4.20
Nitrogen Oxides (NO_x)	100	1.00	5.00
Particulate Matter (PM)	7.6	0.08	0.38
Sulfur Dioxide (SO_2)	0.6	0.01	0.03
Volatile Organic Material (VOM)	5.5	0.06	0.28

These limits are based on the maximum firing rate and standard emission factors (Tables 1.4-1, 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

e. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements of Section 112(g) of the Clean Air Act.

f. Compliance with the annual limits of Conditions 10(b) through (e) 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 of total).

11a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

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

b. Testing required by Conditions 12 and 13 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

12. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate

compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.

13a. Pursuant to 35 Ill. Adm. Code 218.187(g)(1), testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218.187 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA, or as otherwise specified in 35 Ill. Adm. Code 218.187. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting the testing to allow the Illinois EPA to be present during the testing;

b. Pursuant to 35 Ill. Adm. Code 218.187(g)(2), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.187(b)(1), and to determine the VOM content of cleaning solvents and cleaning solutions, shall be conducted as follows:

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

ii. The manufacturer’s specifications for VOM content for cleaning solvents may be used if such manufacturer’s specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a), however, Method 24 shall be used to determine compliance. In the event of any inconsistency between a Method 24 test and the manufacturer's specifications, the Method 24 test shall govern;

c. Pursuant to 35 Ill. Adm. Code 218.187(g)(3), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;

d. Pursuant to 35 Ill. Adm. Code 218.404(a), the VOM content of each lithographic coating and ink and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.404.

14. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source’s potential to emit or an exclusion, the owner or operator must keep a record of

the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

15. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.

16a. Pursuant to 35 Ill. Adm. Code 218.187(e)(3), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187 (b)(1) shall collect and record the following information for each cleaning solution used:

i. For each cleaning solution that is prepared at the source with automatic equipment:

A. The name and identification of each cleaning solution;

B. The VOM content of each cleaning solvent in the cleaning solution;

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

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

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

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

ii. For each batch of cleaning solution that is not prepared at the source with automatic equipment:

A. The name and identification of each cleaning solution;

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

C. The VOM content of each cleaning solvent in the cleaning solution;

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

E. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are not prepared at the site but are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a);

b. Pursuant to 35 Ill. Adm. Code 218.187(e)(4), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187 (b)(2) shall collect and record the following information for each cleaning solution used:

i. The name and identification of each cleaning solution;

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

iii. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;

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

v. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;

c. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.

d. Pursuant to 35 Ill. Adm. Code 218.404(b)(2), the owner or operator of a printing line which is exempted from any of the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402(a) shall collect and record all of the following information each year for each printing line and maintain the information at the source for a period of three years:

i. The name and identification number of each coating and ink as applied on each printing line.

ii. The VOM content and the volume of each coating and ink as applied each year on each printing line.

17a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:

i. Amount of each material, which contains either VOM or HAP, used on printing presses FP1 - FP15 and silk screen printing presses SP1 - SP10, which were constructed prior to June 15, 2005, (lbs/week and tons/year);

ii. Amount of each material, which contains either VOM or HAP, used on all flexographic printing presses FP1 - FP21 (lbs/week, tons/month, and tons/year);

iii. Amount of each material, which contains either VOM or HAP, used on all silk screen printing presses SP1 – SP33 (tons/month and tons/year);

iv. VOM and HAP content of each material containing VOM or HAP (% by weight);

v. Certified amount of waste shipped-off (tons/month and tons/year) and its VOM content (% by weight);

vi. Weekly and annual emissions of VOM and HAPs for printing presses FP1 - FP15 and silk screen printing presses SP1 - SP10 (which were constructed prior to June 15, 2005) with supporting calculations (lbs/week and tons/year);

vii. Weekly and annual emissions of VOM and HAPs from flexographic printing presses FP1 - FP21 with supporting calculations (lbs/week and tons/year);

viii. Monthly and annual emissions of VOM and HAPs from screen printing presses SP1 – SP33 with supporting calculations (ton/month and tons/year);

ix. Natural gas usage of the heaters and dryers (mmscf/month and mmscf/year); and

x. Monthly and annual emissions of CO, NO_x, PM, SO_2, VOM and HAPs from the source with supporting calculations (tons/month and tons/year).

b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

18. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.

19a. Pursuant to 35 Ill. Adm. Code 218.187(e)(2)(B), all sources subject to the requirements of 35 Ill. Adm. Code 218.187 shall at least 30 calendar days before changing the method of compliance between 35 Ill. Adm. Code 218.187(b)(1), (b)(2), (b)(4), or (b)(5) and 35 Ill. Adm. Code 218.187(b)(3), notify the Illinois EPA in writing of such change. The notification shall include a demonstration of compliance with the newly applicable subsection;

b. Pursuant to 35 Ill. Adm. Code 218.187(e)(9), all sources subject to the requirements of 35 Ill. Adm. Code 218.187(b) and (d) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.187(b) or (d) by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation.

c. Pursuant to 35 Ill. Adm. Code 218.404(b)(3), any owner or operator of a flexographic printing line which is exempted from the any of limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402 shall notify the Illinois EPA of any record showing that total maximum theoretical emissions of VOM from all printing lines exceed 90.7 Mg (100 tons) in any calendar year before the application of capture systems and control devices by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs.

d. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.

20a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

b. Two (2) copies of required reports and notifications shall be sent to:

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

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

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

It should be noted that the two 167.8 kW natural gas-powered emergency generators and the 286 kW natural gas-powered emergency generator are exempt from permitting pursuant to 35 Ill. Adm. Code 201.146(i).

If you have any questions on this, please call Valeriy Brodsky at 217/785-1705.

Edwin C. Bakowski, P.E. Date Signed: _____
Manager, Permit Section
Division of Air Pollution Control

ECB:VJB:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the packaging printing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 10 tons/year for any single HAP and 25 tons/year for any combination of such HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

	Emissions (tons/year)						
Emission Unit	CO	NO_x	PM	SO_2	VOM	Single HAP	Combined HAP
21 Flexographic Printing Presses					22.89		
33 Silk Screen Printing Presses					4.42		
Heaters and Dryers	4.20	5.00	0.38	0.03	0.28	----	----
Total	4.20	5.00	0.38	0.03	27.59	9.0	22.5

VJB:psj

Attachment B - Emissions Reduction Market System (ERMS)

1. Description of ERMS

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

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' FESOP or CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

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

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

2. Applicability

Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons, not including VOM emissions from insignificant emission units and activities. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part

205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205.

3. Recordkeeping and Reporting

a. The Permittee shall maintain the following records to determine compliance with the above limitation:

i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;

ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures, which may be specified in this permit; and

iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.

b. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by November 30 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 Ill. Adm. Code 205.205(b) and 35 Ill. Adm. Code 205.300.

c. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and shall immediately comply with 35 Ill. Adm. Code Part 205, including holding allotment trading units (ATUs) for its VOM emissions during the first seasonal allotment period it exceeds 15 tons and each seasonal allotment period, thereafter, pursuant to 35 Ill. Adm. Code 205.150(c).