

217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Pechiney Plastic Packaging, Inc.
Attn: Tom Nelson, Plant Manager
475 North Kirk Road
Batavia, Illinois 60510

<u>Application No.:</u> 95080006	<u>I.D. No.:</u> 089010ACC
<u>Applicant's Designation:</u>	<u>Date Received:</u> August 1, 1995
<u>Operation of:</u> Printing and Coating of Flexible Packaging	
<u>Date Issued:</u> May 28, 2002	<u>Expiration Date</u> ² : May 28, 2007
<u>Source Location:</u> 475 North Kirk Road, Batavia, Kane County	
<u>Responsible Official:</u> Tom Nelson, Plant Manager	

This permit is hereby granted to the above-designated Permittee to OPERATE printing and coating of a flexible packaging source, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: June 24, 2002
Revision Date Issued: April 20, 2004
Purpose of Revision: Minor Modification

This minor modification increases all monthly allowable VOM emissions in the permit, but with no increase in annual VOM emissions. Recordkeeping and compliance procedures for the clean-up solvent in Section 7.4 were updated to match Construction Permit 01050095, due to that being the preference of the Permittee. The source-wide allowable permitted emissions in Section 5.1 were lowered. The emission control equipment description for the cleanup operation was corrected. Indicating all clean-up is controlled by an oxidizer system. The owner name was updated and the name for written correspondence was updated.

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

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

DES:DWH:jar

cc: Illinois EPA, FOS, Region 1
USEPA

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

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Pechiney Plastic Packaging, Inc.
475 North Kirk Road
Batavia, Illinois 60510
414/727-6000

I.D. No.: 089010ACC
Standard Industrial Classification: 2671, Packaging Paper and
Plastic Film, Coated and
Laminated

1.2 Owner/Parent Company

Pechiney Plastic Packaging, Inc.
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631

1.3 Operator

Pechiney Plastic Packaging, Inc.
475 North Kirk Road
Batavia, Illinois 60510

Tom Nelson, Plant Manager
630/879-4800

1.4 General Source Description

Pechiney Plastic Packaging, Inc. is located at 475 North Kirk Road, Batavia, Illinois. The source operates flexographic printing presses and extruder laminator/coating process lines associated with the manufacture of flexible packaging products.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
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:

None

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

None

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

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)].

Extruders used for the extrusion of metals, minerals, plastics, rubber, or wood, excluding extruders used in the manufacture of polymers, provided that volatile organic materials or class I or II substances subject to the requirements of Title VI of the CAA are not used as foaming agents or release agents or were not used as foaming agents in the case of extruders processing scrap material [35 IAC 201.210(a)(5)].

- 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, 218.182, or 219.182.
- 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, 218.301, or 219.301, 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. If no odor nuisance exists this limitation shall apply only to photochemically reactive material [35 IAC 218.301].

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
01	3-Flexographic Printing Lines (Lines P54, P55, and P56)	P54-1991, P55-1994, and P56-1997	Regenerative and Recuperative Thermal Oxidation Systems
02	3-Extruder Laminator Lines (L62, L64, and L65) and 1-Coating Line (L63)	L62-1978, L63-1985, L64-1991, and L65-1997	Regenerative and Recuperative Thermal Oxidation Systems Extruder/Laminator L64 and L65 are Not Connected to Emission Control Equipment
03	Cold Cleaning Parts Washer	1995	Regenerative and Recuperative Thermal Oxidation Systems
04	Clean-Up Operations	*	Regenerative and Recuperative Thermal Oxidation Systems

* Clean-up is intrinsic to the operation of the printing and extruder laminator/coating process lines, and that such operations have always been conducted at the facility.

Also clean-up for emission units 01 and 02 will be performed within a permanent total enclosure and vented to the oxidizer system.

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM 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.
- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

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

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an

approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

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.

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.

5.3 Non-Applicability of Regulations of Concern

N/A

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)	113.40
Sulfur Dioxide (SO ₂)	-----
Particulate Matter (PM)	0.40
Nitrogen Oxides (NO _x)	8.40
HAP, not included in VOM or PM	-----
Total	122.20

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the source being a major source of HAP emissions, as defined at 40 CFR 63.2 and 40 CFR 63.820(a)(2) at which wide-web flexographic printing processes are operated. The Permittee shall comply with applicable emission limitations contained in 40 CFR Part 63, Subpart KK.

5.5.3 Other Source-Wide Emission Limitations

- a.
 - i. The flexographic printing presses, extruder laminator lines and coating line are subject to a National Emission Standard for Hazardous Air Pollutants (NESHAP) for hazardous air pollutants, 40 CFR 63, Subparts A and KK National Emission Standards for the Printing and Publishing Industry. The Illinois EPA is administering NESHAP emission standard for Hazardous air pollutants.
 - ii. The extruder laminator lines and coating line are subject to 40 CFR 63 as the Permittee has decided to include this equipment pursuant to 40 CFR 63.821(a)(3).
- b. The flexographic printing lines, extruder laminators and coating line shall limit emissions to no more than five percent of the organic HAP applied for the month or to no more than four percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinner, and other materials applied for the month; or to no more than 20 percent of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month. The owner or operator of each product and packaging rotogravure or wide-web flexographic printing affected source shall demonstrate compliance with this standard by following one of the procedures listed below:

- i. Demonstrate that each ink, coating, varnish, adhesive primer, solvent, diluent, reducer, thinner, and other material applied during the month contains no more than 0.04 weight-fraction organic HAP, on an as-purchased basis. [40 CFR 63.825(b) (1)]
- ii. Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied during the month contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis as determined in accordance with paragraphs (b) (2) (i)-(ii) of this section. The owner or operator shall calculate the as-applied HAP content of materials which are reduced, thinned, or diluted prior to application, as follows [40 CFR 63.825(b) (2)]:
 - A. Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied on an as-purchased basis in accordance with 40 CFR 63.827(b) (2) [40 CFR 63.825(b) (2) (i)].
 - B. Calculate the monthly average as-applied organic HAP content, C_{ahi} of each ink, coating, varnish, adhesive, primer, and other solids-containing material using Equation 3 [40 CFR 63.825(b) (2) (ii)].

$$C_{ahi} = \frac{\left(C_{hi} M_i + \sum_{j=1}^q C_{hij} M_{ij} \right)}{M_i + \sum_{j=1}^q M_{ij}} \quad \text{Eq. 3}$$

- iii. Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied, either [40 CFR 63.825(b) (3)]:
 - A. Contains no more than 0.04 weight-fraction organic HAP on a monthly average as-applied basis, or
 - B. Contains no more than 0.20 kg of organic HAP per kg of solids applied, on a monthly average as-applied basis.

The owner or operator may calculate the monthly average as-applied solids content of materials which are reduced, thinned,

or diluted prior to application, using Equation 4, and

$$C_{asi} = \frac{C_{si} M_i}{M_i + \sum_{j=1}^q M_{ij}} \quad \text{Eq. 4}$$

- iv. Demonstrate that the monthly average as-applied organic HAP content, H_L , of all materials applied is less than 0.04 kg HAP per kg of material applied, as determined by Equation 6 [40 CFR 63.825(b)(iv)].

$$H_L = \frac{\sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}}{\sum_{i=1}^p M_i + \sum_{j=1}^q M_j} \quad \text{Eq. 6}$$

- v. Demonstrate that the monthly average as-applied organic HAP content on the basis of solids applied, H_s , is less than 0.20 kg HAP per kg solids applied as determined by Equation 7 [40 CFR 63.825(b)(v)].

$$H_s = \frac{\sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}}{\sum_{i=1}^p M_i C_{si}} \quad \text{Eq. 7}$$

- vi. Demonstrate that the total monthly organic HAP applied, H , as determined by Equation 8, is less than the calculated equivalent allowable organic HAP, H_a , as determined by paragraph (e) [40 CFR 63.825(e)].

$$H = \sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}$$

- c. The symbols used in equations in this subpart are defined as follows:

- i. C_{ahi} = the monthly average, as-applied, organic HAP content of solids-containing material, i , expressed as a weight-fraction, kg/kg.
- ii. C_{asi} = the monthly average, as-applied, solids content, of solids-containing material, i , expressed as a weight-fraction, kg/kg.

- iii. C_{hi} = the organic HAP content of ink or other solids-containing materials, i , expressed as a weight-fraction, kg/kg.
- iv. C_{hij} = the organic HAP content of solvent j , added to solids-containing material i , expressed as a weight-fraction, kg/kg.
- v. C_{hj} = the organic HAP content of solvent j , expressed as a weight-fraction, kg/kg.
- vi. C_{si} = the solids content of ink or other material, i , expressed as a weight-fraction, kg/kg.
- vii. H = the total monthly organic HAP applied, kg.
- viii. H_L = the monthly average, as-applied, organic HAP content of all solids-containing materials applied at less than 0.04 kg organic HAP per kg of material applied, kg/kg.
- ix. H_s = the monthly average, as-applied, organic HAP to solids ratio, kg organic HAP/kg solids applied.
- x. H_{si} = the as-applied, organic HAP to solids ratio of material i .
- xi. M_i = the mass of ink or other material, i , applied in a month, kg.
- xii. M_{ij} = the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j , added to solids-containing material, i , in a month, kg.
- xiii. M_j = the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j , applied in a month, kg.
- xiv. n = the number of organic compounds in the vent gas.
- xv. p = the number of different inks, coatings, varnishes, adhesives,

primers, and other material applied in a month.

- xvi. q = the number of different solvents, thinners, reducers, diluents, or other non-solids-containing materials applied in a month.
 - xvii. 0.0416 = conversion factor for molar volume, kg-mol/m^3 (@ 293 K and 760 mmHg).
- d. Each owner or operator of a product and packaging rotogravure or wide-web flexographic printing facility shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following one of the procedures in 40 CFR 63.827 (b) (2) (i) through (b) (2) (iii) of this section [40 CFR 63.827(b) (2)]:
- i. The owner or operator may test the material in accordance with Method 311 of appendix A of this part 63. The Method 311 determination may be performed by the manufacturer of the material and the results provided to the owner or operator [40 CFR 63.827(b) (2) (i)].
 - ii. The owner or operator may determine the volatile matter content of the material in accordance with 40 CFR 63.827(c) (2) and use this value for the organic HAP content for all compliance purposes [40 CFR 63.827(b) (2) (ii)].
 - iii. The owner or operator may, except as noted in paragraph 40 CFR 63.827(b) (2) (iv) of this section, rely on formulation data provided by the manufacturer of the material on a CPDS if the manufacturer meets the criteria of 40 CFR 63.827(b) (2) (iii) (A) and (B) [40 CFR 63.827(b) (2) (iii)].
- e. Each owner or operator of a product and packaging rotogravure or wide-web flexographic printing facility shall maintain the following records:
- i. The organic HAP content of all solids containing materials applied on the printing lines and coating lines, with basis.
 - ii. The amount of each solids containing materials applied on the printing lines and coating line per month, kg.

iii. Monthly average organic HAP content per kg of solids applied.

f. The Permittee shall perform the reporting requirements of 40 CFR 63.830.

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, including HAP emissions.

5.6.2 The Permittee shall maintain records of necessary information to demonstrate compliance with any of the HAP limitations presented in 40 CFR 63.825(b), in accordance with any of the procedures identified in 40 CFR 63.825(b)(1) through 40 CFR 63.825(b)(10).

5.6.3 Records for Operating Scenarios

N/A

5.6.4 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

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 The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source. This information may be contained in, or with, the annual emissions required pursuant to Condition 9.7.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

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

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

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

6.2 Applicability

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

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
 - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

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

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

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

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

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

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 337 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 33.62 tons per season.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.

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

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

b. Contingent Allotments for New or Modified Emission Units

None

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

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

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

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

6.9 Recordkeeping for ERMS

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

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

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

6.11 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

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

Flexographic Printing Lines P54, P55 and P56
Laminator Lines L62, L64 and L65
Coating Line L63

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

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

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01: Flexographic Presses

7.1.1 Description

01 - Three flexographic printing presses are used to print on paper, film, metallic foil, and/or composite materials, with the capability of using compliant low-VOM materials using water-based or solvent-based materials. The printing or coating is a continuous process performed on rollstock. Each printing press has gas-fired dryer(s) to dry inks and coatings. VOM emissions result from the use of solvent-based materials, and compliant low-VOM materials. Fuel combustion emissions results from the use of natural gas in the dryers.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	3-Flexographic Printing Lines (Lines P54, P-55, and P56)	P54-1991, P55-1994, and P56-1997	Regenerative and Recuperative Thermal Oxidation Systems

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected printing line" for the purpose of these unit-specific conditions is each flexographic press (P54, P55, and P56) and associated dryer(s), used to perform printing. Each affected printing line is identified in Condition 7.1.2.
- b. Each affected printing line is subject to the requirements of 35 IAC Subpart H: Printing and Publishing. An affected printing line shall comply with the following limitations of 35 IAC 218.401(a) (1) or (a) (2), or alternatively comply with the requirements of 35 IAC 218.401(b) or (c).
 - i. Each affected printing line complying by 35 IAC 218.401(a) shall not apply at any time any coating or ink unless the VOM content does not exceed the following limitations of A or B below:
 - A. Forty percent VOM by volume of the coating and ink (minus water and any compounds which are specifically exempted from the definition of VOM), or
 - B. Twenty-five percent VOM by volume of the volatile content in the coating and ink.

ii. Each affected printing line complying by 35 IAC 218.401(b) shall not apply coatings or inks unless the weighted average, by volume, VOM content of all coatings and inks as applied each day does not exceed the limitation specified in either A or B below:

A. The following equation shall be used to determine if the weighted average VOM content of all coatings and inks as applied each day on the affected printing line exceeds the limitation of forty percent VOM by volume of the coating and ink (minus water and any compounds which are specifically exempted from the definition of VOM), specified by 35 IAC 218.401(a) (1):

$$VOM(i) (A) = \frac{\sum_{i=1}^n C_i L_i (V_{si} + V_{vomi})}{\sum_{i=1}^n L_i (V_{si} + V_{vomi})}$$

Where:

$VOM_{(i) (A)}$ = The weighted average VOM content in units of percent VOM by volume of all coatings and inks (minus water and any compounds which are specifically exempted from the definition of VOM) used each day;

i = Subscript denoting a specific coating or ink as applied;

n = The number of different coatings and/or inks as applied each day on each affected printing line;

C_i = The VOM content in units of percent VOM by volume of each coating or ink as applied (minus water and any compounds which are specifically exempted from the definition of VOM);

L_i = The liquid volume of each coating or ink as applied in units of 1 (gal);

V_{si} = The volume fraction of solids in each coating or ink as applied; and

V_{vomi} = The volume fraction of VOM in each coating or ink as applied.

B. The following equation shall be used to determine if the weighted average VOM content of all coatings and inks as applied each day on the affected printing line exceeds the limitation of twenty-five percent VOM by volume of the volatile content in the coating and ink, specified by 35 IAC 218.401(a)(2):

$$VOM(i)(B) = \frac{\sum_{i=1}^n C_i L_i V_{vmi}}{\sum_{i=1}^n L_i V_{vmi}}$$

Where:

$VOM_{(i)(B)}$ = The weighted average VOM content in units of percent VOM by volume of all coatings and inks used each day;

i = Subscript denoting a specific coating or ink as applied;

n = The number of different coatings and/or inks as applied each day on each affected printing line;

C_i = The VOM content in units of percent VOM by volume of the volatile matter in each coating or ink as applied;

L_i = The liquid volume of each coating or ink as applied in units of 1 (gal); and

V_{vmi} = The volume fraction of volatile matter in each coating or ink as applied.

- iii. Each affected printing line equipped with a capture system and control device complying by 35 IAC 218.401(c) shall not operate the affected printing line unless the owner or operator meets the requirements in A, B, or C and D, E, and F below.
 - A. A carbon adsorption system is used which reduces the captured VOM emissions by at least 90 percent by weight, or
 - B. An incineration system is used which reduces the captured VOM emissions by at least 90 percent by weight, or
 - C. An alternative VOM emission reduction system is used which is demonstrated to have at least a 90 percent control device efficiency, approved by the Illinois EPA and approved by USEPA as a SIP revision, and
 - D. The affected printing line is equipped with a capture system and control device that provides an overall reduction in VOM emissions of at least 75 percent where a publication rotogravure printing line is employed, or 65 percent where a packaging rotogravure printing line is employed, or 60 percent where a flexographic printing line is employed, and
 - E. The control device is equipped with the applicable monitoring equipment specified in 35 IAC 218.105(d) (2) and except as provided in 35 IAC 218.105(d) (3), the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times the control device is in use, and
 - F. The capture system and control device is operated at all times when the affected printing line is using non-compliant inks and/or coatings. Under such conditions, the Permittee shall demonstrate compliance with this subsection by using the applicable capture system and control device test methods and procedures specified in 35 IAC 218.105(c) through (f), or other methods and procedures approved by the Illinois EPA or in accordance with current USEPA guidelines and approval is granted by the Illinois

EPA and by complying with the recordkeeping and reporting requirements specified in 35 IAC 218.404(e).

- c. Each affected printing line is subject to the emission limits identified in Conditions 5.2.2 and 5.5.
- d. Malfunction and Breakdown Provisions

In the event of a malfunction or breakdown of an oxidizer, the Permittee is authorized to continue operation of an affected printing line if such line is using compliant low-VOM materials or if authorized by a provisional variance approved pursuant to 35 IAC 180.

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected printing lines are not subject to 35 IAC 218.204(c), Coating Operations - Paper Coating, as the paper coating limitation does not apply to a line on which printing is performed which complies with the emission limitations in 35 IAC 218.401 [35 IAC 218.204(c)].
- b. This permit is issued based on the affected printing press not being subject to the 40 CFR 60, Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing, because the affected printing presses are not used to coat flexible vinyl or urethane products which excludes flexible packaging.
- c. The affected printing lines are not subject to the requirements of 35 IAC 218 Subpart G: Use of Organic Materials [35 IAC 218.402(b)].

7.1.5 Operation and Control Requirements

- a. For each affected printing line complying by 35 IAC 218.401(c) the control device shall be equipped with the applicable monitoring equipment, calibrated, operated and maintained according to vendor specifications at all times the control device is in use [35 IAC 218.401(c) (5)].
- b. For each affected printing line complying by 35 IAC 218.401(c) the capture system and control device are operated when the subject printing line is in operation using non-compliant inks or coating materials [35 IAC 218.401(c) (6)].

- c. The minimum overall control efficiency including capture and destruction shall be at least the following:

<u>Affected Printing Line</u>	<u>Overall Control Efficiency</u>
P54	93.5 %
P55	85.50%
P56	85.50%
Flexographic Decks	85.50%
In Line Gravure Deck	95.0 %

The above limitations were established in Permit 01050095, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

- d. For each affected printing line complying by 35 IAC 218.401(c), notwithstanding 35 IAC 218.107, seasonal shutdown of the oxidizers is not permitted. This limitation was established in Construction Permit 96120080.
- e. Natural gas shall be the only fuel fired in the press dryer(s) of each affected printing line.
- f. The Permittee shall follow good operating practices for the oxidizers, including periodic inspection, routine maintenance and repair of defects.
- g.
 - i. During such periods the Megtec oxidizer shall be operated and maintained with a minimum combustion chamber temperature of 1600°F, hourly average.
 - ii. Upon approval by the Illinois EPA, the Permittee may be allowed to adjust the minimum combustion chamber temperature of the Megtec oxidizer if approved source test data demonstrates compliance with the Special Conditions of this permit and all state and federal regulations at the adjusted temperature and operating conditions.

7.1.6 Emission Limitations

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

- a. Emissions of VOM shall not exceed the following limits:

<u>Affected Printing Line</u>	<u>VOM Emissions</u>	
	<u>(ton/mo)</u>	<u>(ton/yr)</u>
P54	3.25	13.0
P55	6.23	24.9
P56 (Flexo Deck)	6.23	24.9
P56 (Gravure Deck)	3.48	13.9

The above limitations contain revisions to previously issued Permit 01050095. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, monthly VOM emission limits have been increased from 10% of the annual limits to 25% of the annual limits. Annual VOM emission limits remain the same, no increase has occurred. The Permittee has requested these changes to allow flexibility to manage month-to-month variability in business demand [T1R].

A netting exercise was performed with the above lines in Construction Permit 01050095.

7.1.7 Testing Requirements

- a. The VOM content of each coating and ink shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105(a) [35 IAC 218.401(a)].
- b. When requested by the Illinois EPA, performance testing shall be conducted in accordance with the applicable test methods and procedures specified in 35 IAC 218.105(c) through (f) [35 IAC 218.401(c)(6)] unless another method is approved by the Illinois EPA

or in accordance with current USEPA guidelines and approval is granted by the Illinois EPA.

- c. Each owner or operator of a product and packaging rotogravure or wide-web flexographic printing facility shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, an other material applied using Method 24 of 40 CFR Part 60, Appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the owner or operator. If these values cannot be determined using Method 24, the owner or operator shall submit an alternative technique for determining their values for approval by the Administrator.

Owners or operators may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Appendix A, the applicable test method shall govern, unless after consultation, the owner or operator can demonstrate to the satisfaction of this enforcement agency that the formulation data are correct [40 CFR 63.827(c)].

7.1.8 Monitoring Requirements

The regenerative and recuperative thermal oxidizers and shall use an Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained and operated according to vendor specifications at all times the oxidizers are in use. The continuous monitoring equipment shall monitor and record the combustion chamber temperature of each oxidizer, as specified in 35 IAC 218.105(d) (2) [35 IAC 218.401(c) (5)].

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected printing line to address compliance with Conditions 5.5 and 7.1.6, pursuant to Section 39.5(7) (b) of the Act:

- a. Each affected printing line complying by 218.401(a) is subject to the recordkeeping requirements of 35 IAC 218.404(c), which provides that the Permittee of an affected printing line shall collect and record all of the following information each day for each

affected 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 affected printing line.
 - ii. The VOM content of each coating and ink as applied each day on each affected printing line.
- b. Each affected printing line complying by 218.401(b) is subject to the recordkeeping requirements of 35 IAC 218.404(d), which provides that the Permittee shall collect and record all of the following information each day 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 day on each printing line.
 - iii. The daily-weighted average VOM content of all coatings and inks as applied on each printing line.
- c. The owner or operator of an affected printing line shall collect and record all of the following information 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 VOM containing material used.
 - ii. The VOM content (wt. %) of each VOM containing material used.
 - iii. Usage of each VOM containing material when an oxidation system is in operation controlling that affected printing line, (lb/mo).
 - iv. When in operation, the actual overall VOM control efficiency the oxidation system provides for that affected printing line. (% VOM reduction)

- v. Usage of each VOM containing material when the oxidation system is not in operation for that affected printing line, (lb/mo).
 - vi. VOM emissions calculated in accordance with the procedures given in Condition 7.1.2 (lb/mo and ton/yr).
- d. The owner or operator of an affected printing line shall collect and record all of the following information for the printing line dryers and control devices and maintain the information at the source for a period of three years:
- i. Plant wide fuel usage (mmscf/yr).
 - ii. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.1.12 (ton/yr).

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of an affected printing line 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. The Permittee of an affected printing line shall notify the Illinois EPA in the following instances:
 - i. Any record showing violation of Section 218.401(a), (b), or (c); as specified by Conditions 7.1.3(b)(i), (ii), and (iii), respectively, shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - ii. At least 30 calendar days before changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(a) to 35 IAC 218.401(b) or (c), the Permittee shall comply with all requirements of 35 IAC 218.404(d)(1) and (e)(1), respectively. Upon changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(a) to 35 IAC 218.401(b) or (c), the Permittee shall comply with all requirements of 35 IAC 218.404(d) or (e), respectively.
 - iii. At least 30 calendar days before changing the method of compliance with 35 IAC 218.401 from

35 IAC 218.401(b) to 35 IAC 218.401(a) or 35 IAC 218.401(c), the Permittee shall comply with all requirements of 35 IAC 218.404(c)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(b) to 35 IAC 218.401(a) or (c), the Permittee shall comply with all requirements of 35 IAC 218.404(c) or (e), respectively.

- iv. At least 30 calendar days before changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(c) to 35 IAC 218.401(a) or (b), the Permittee shall comply with all requirements of 35 IAC 218.404(c)(1) or (d)(1), respectively. Upon changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(c) to 35 IAC 218.401(a) or (b), the Permittee shall comply with all requirements of 35 IAC 218.404(c) or (d), respectively.
- b. Any record showing violation of the operating and control requirements of Condition 7.1.5 and emission limitations of Condition 7.1.6, shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3(b) shall be addressed by the testing requirements of Condition 7.1.7.
- b. Compliance with Condition 7.1.3(d) is assumed to be achieved by the normal work practices and maintenance activities inherent in the operation of the affected printing lines.
- c. i. Compliance with Conditions 5.5 and 7.1.6 for each affected printing line shall be addressed by the recordkeeping requirements of Condition 7.1.9 and the formula(s) given below:

$$E_v = \sum_{i=1}^n C_i W_i (1-D_v)$$

Where:

v = Printing Line Identification

- n = The total number of VOM containing materials applied on line v
- E_v = Total VOM emissions from line v
- C_i = Quantity of VOM containing material used on line v each month (lb/mo)
- W_i = VOM content of VOM containing material applied on line v each month (wt. % VOM)
- D_v = Overall control efficiency (actual combined capture and control efficiencies) of the device(s) controlling line v.

ii. Compliance with the annual limits shall be addressed on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

d. Compliance with Condition 5.5 for the affected printing line dryers and control devices fuel combustion emissions shall be addressed by the recordkeeping requirements of Condition 7.1.9 and the formula(s) given below:

$$E_p = FP_p * \left(\frac{\text{ton}}{2,000 \text{ lb}} \right)$$

Where:

- p = Pollutant type
- E_p = Emissions of pollutant type p from natural gas combustion (ton/yr)
- F = Natural gas usage (mmscf/yr)
- P_p = Emission factor for pollutant type p selected from the Table 1 below (lb/mmscf)

Table 1

Emission factors for natural gas combustion units from Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement F, March, 1998.

Pollutant Type	Emission Factor (lb/mmscf)
NO _x	100
VOM	5.5
PM	7.6
SO ₂	0.6

7.2 Unit 02: Coating Lines

7.2.1 Description

02 - Three extruder laminator lines and one coating line are used to apply a decorative, protective or functional coating or ink on flexible packaging consisting of paper, film, metallic foil and/or composite materials, with the capability of using compliant low-VOM materials or solvent based materials. The coating or printing is a continuous process performed on rollstock. The extruder laminator/coating process lines have gas-fired dryers to dry liquid coatings and inks. VOM emissions can result from the use of solvent-based materials, and compliant low-VOM materials. Fuel combustion emissions result from the use of natural gas in the dryers.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
02	3-Extruder Laminator Lines (L62, L64, L65, and 1-Coating Line L63	L62-1978, L63-1985, L64-1991, and L65-1997	Regenerative and Recuperative Thermal Oxidation Systems Extruder/Laminator L64 and L65 are not connected to emission control equipment

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line" for the purpose of these unit-specific conditions is each extruder/laminator line or coating line (L62, L63, L64, and L65) and associated dryer(s). Each affected coating line is identified in Condition 7.2.2.
- b. When processing non-complaint coating(s) each affected coating line is subject to 35 IAC 218.207 Alternative Emissions Limitations, which provides that; no owner or operator of a coating line subject to 35 IAC 218.204(c); Paper Coating, complying by 35 IAC 218.207(b) (1), and equipped with a capture system and control device shall operate the subject coating line unless:
 - i. The affected coating line is equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency, [35 IAC 218.107(b)];

- ii. An affected coating line's capture system and control device are operated at all times the coating line is in operation, [35 IAC 218.207(a)]; and
 - iii. The Permittee demonstrates compliance through the applicable coating analysis and capture system and control device efficiency test methods and procedures specified in 35 IAC Section 218.105 and the recordkeeping and reporting requirements specified in 35 IAC Section 218.211(e); and the control device is equipped with the applicable monitoring equipment specified in Section 218.105(d) of this Part and the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times the control device is in use [35 IAC 218.207(a)].
- c. When processing compliant coatings, the Permittee of an affected coating line (including L62, L63, L64, and L65) shall not apply at any time any coating in which the VOM content (minus water and any compounds specifically exempt from the definition of VOM) exceeds the following limitations [35 IAC 218.204(c)]:

<u>kg/liter</u>	<u>lb/gal</u>
0.28	2.3

- d. Each affected coating line is subject to the emission limits identified in Conditions 5.2.2 and 5.5.
- e. Malfunction and Breakdown Provisions

In the event of a malfunction or breakdown of an oxidizer, the Permittee is authorized to continue operation of an affected extruder laminator or coating line if such line is using compliant low-VOM materials or if authorized by a provisional variance approved pursuant to 35 IAC 180.

7.2.4 Non-Applicability of Regulations of Concern

The affected coating line is not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, which excludes the affected coating lines from these requirements.

7.2.5 Operation and Control Requirements

- a. The capture system and control device for an affected coating line shall be operated at all times that the subject coating line utilizes non-compliant ink or coating materials [35 IAC 218.207(a)].
- b. The control device(s) shall be equipped with the applicable monitoring equipment; calibrated, operated and maintained according to vendor specifications at all times that the control device is in use [35 IAC 218.207(a)].
- c. The minimum overall control efficiency of the oxidizers shall be at least the following:

<u>Affected Coating Line</u>	<u>Overall Control Efficiency</u>
L62	95.00%
L63	81.00%

The above limitations were established in Construction Permit 96120080 pursuant to 35 IAC Part 203. These limits ensure that the construction/modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 IAC Part 203 [T1].

- d. For each affected coating line complying with 35 IAC 218.207, notwithstanding 35 IAC 218.107, seasonal shutdown of the oxidizers is not permitted. This limitation was established in Construction Permit 96120080.
- e. The Permittee shall follow good operating practices for the oxidizers, including periodic inspection, routine maintenance and repair of defects.
- f. Natural gas shall be the only fuel fired in the coating oven(s) and control equipment of each affected coating line.

7.2.6 Emission Limitations

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

- a. Emissions of VOM shall not exceed the following limits:

<u>Affected Coating Line</u>	<u>VOM Emissions</u>	
	<u>(ton/mo)</u>	<u>(ton/yr)</u>
L62	1.44	5.75
L63	3.07	12.27
L64	0.2	0.80
L65	0.13	0.5

The above limitations contain revisions to previously issued Permit 01050095. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, monthly VOM emission limits have been increased from 10% of the annual limits to 25% of the annual limits. Annual VOM emission limits remain the same, no increase has occurred. The Permittee has requested these changes to allow flexibility to manage month-to-month variability in business demand [T1R].

7.2.7 Testing Requirements

- a. When requested by the Illinois EPA, performance testing of each capture system and control shall be conducted in accordance with the applicable test methods and procedures specified in 35 IAC 218.105 [35 IAC 218.211(a)] unless another method is approved by the Illinois EPA or in accordance with current USEPA guidelines and approval is granted by the Illinois EPA.
- b. The VOM content of each ink or coating material shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 [35 IAC 218.211(a)].

7.2.8 Monitoring Requirements

The thermal oxidizers shall use an Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained and operated according to vendor specifications at all times the oxidizers are in use. The continuous monitoring equipment shall monitor and record the combustion chamber temperature of each oxidizer, as specified in 35 IAC 218.105(d) (2) [35 IAC 218.207(a)].

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 coating line to address the compliance with Conditions 5.5 and 7.2.6, pursuant to Section 39.5(7) (b) of the Act:

- a. Each affected coating line complying by the Alternative Emission Limitations of 35 IAC 218.207(c) is subject to the recordkeeping requirements of 35 IAC 218.211(e), which provides that:
 - i. The Permittee shall collect and record all of the following information each day for each affected coating line and maintain the information at the source for a period of three years:
 - A. Control device monitoring data.
 - B. A log of operating time for the capture system, control device, monitoring equipment and the associated coating line. Alternatively, for malfunction-related downtimes associated with extruder laminator/coating line emissions, the Permittee may provide immediate notification to the Illinois EPA of downtimes of capture systems, control devices, or monitoring equipment. However, the Permittee must abide by the malfunction and breakdown provisions in Condition 7.2.3.
 - C. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- b. Each affected coating line complying by the Paper Coating Emission Limitation of 35 IAC 218.204(c) is

subject to the recordkeeping requirements of 35 IAC 218.211(c), which provides that:

- i. The Permittee shall collect and record all of the following information for each coating line and maintain the information at the source for a period of three years:
 - A. The name and identification number of each coating as applied on each affected coating line.
 - B. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied on each coating line.
- c. The Permittee shall collect and record all of the following information for each coating line and maintain the information at the source for a period of three years:
 - i. The name and identification number of each VOM containing material used.
 - ii. The VOM content (wt. %) of each VOM containing material used.
 - iii. Usage of each VOM containing material when an oxidation system is in operation controlling that affected coating line, (lb/mo).
 - iv. When in operation, the actual overall VOM control efficiency the oxidation system provides for that affected coating line, (% VOM reduction).
 - v. Usage of each VOM containing material when the oxidation system is not in operation for that affected coating line, (lb/mo).
 - vi. VOM emissions calculated in accordance with the procedures given in Condition 7.2.12 (lb/mo and ton/yr).
- d. The owner or operator of an affected coating line shall collect and record all of the following information for the coating line dryer and control devices and maintain the information at the source for a period of three years:
 - i. Plant wide fuel usage (mmscf/yr).

- ii. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.2.12 (ton/yr).

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of an affected coating line 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. Each affected coating line is subject to reporting requirements of 35 IAC 218.207(e)(3), which provides that:
 - i. The owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
 - A. Any record showing violation of 35 IAC Section 218.207 or 218.204, shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - B. Any record showing violation of the operating and control requirements of Condition 7.2.5 and emission limitations of Condition 7.2.6, shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

In the event of a malfunction or breakdown of an oxidizer, the Permittee is authorized to continue operation of an affected coating line if emissions are directed to the facility's other oxidizer.

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3(b) shall be addressed by the testing requirements of Condition 7.2.7.
- b. Compliance with Condition 7.2.3(c) is assumed to be achieved by the normal work practices and maintenance activities inherent in the operation of the affected coating lines.

- c. i. Compliance with Conditions 5.5 and 7.2.6 for each affected coating line shall be addressed by the recordkeeping requirements of Condition 7.2.9 and the formula(s) given below:

$$E_v = \sum_{i=1}^n C_i W_i (1-D_v)$$

Where:

- v = Coating Line Identification
- n = The total number of VOM containing materials applied on line v
- E_v = Total VOM emissions from line v
- C_i = Quantity of VOM containing material used on line v each month (lb/mo)
- W_i = VOM content of VOM containing material applied on line v each month (wt. % VOM)
- D_v = Overall control efficiency combined (capture and control efficiency) of the device(s) controlling line v.

- ii. Compliance with the annual limits shall be addressed on a monthly basis from the sum of the data for each line for the current month plus the preceding 11 months.

- d. Compliance with Condition 5.5 for the affected coating line dryers and control devices fuel combustion emissions shall be addressed by the recordkeeping requirements of Condition 7.2.9 and the formula(s) given below, unless previously accounted for in Section 7.1 calculations:

$$E_p = F P_p * \left(\frac{\text{ton}}{2,000 \text{ lb}} \right)$$

Where:

- p = Pollutant type
- E_p = Emissions of pollutant type p from natural gas combustion (ton/yr)
- F = Natural gas usage (mmscf/yr)

P_p = Emission factor for pollutant type p
selected from the Table 1 below
(lb/mmscf)

Table 1

Emission factors for natural gas combustion units
from Tables 1.4-1 and 1.4-2, AP-42, Volume I,
Supplement F, March 1998.

<u>Pollutant Type</u>	<u>Emission Factor (lb/mmscf)</u>
NO _x	100
VOM	5.5
PM	7.6
SO ₂	0.6

7.3 Unit 03: Cold Cleaning Parts Washer

7.3.1 Description

03 - One cold cleaning parts washer machine uses solvent to clean printer and coater parts. The parts are cleaned and drained in an enclosed chamber. Dirty solvent from the parts washer is circulated to an on-site distillation unit for recycling, and clean solvent from the distillation unit is circulated back to the parts washer. The parts washer is designed and maintained to achieve 100% capture of VOM emissions with the captured emissions controlled by a thermal oxidizer or similar control unit which achieves a minimum of 95% destruction efficiency.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
03	Cold Cleaning Parts Washer	1995	Regenerative and Recuperative Oxidation System

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected degreaser" for the purpose of these unit-specific conditions is a cold cleaning parts washer as identified in Condition 7.3.2.
- b. Each affected degreaser is subject to 35 IAC 218.182; Cold Cleaning, which provides that; no owner or operator of a cold cleaning degreaser shall operate the subject cold cleaning parts washer unless:
 - i. Pursuant to 35 IAC 218.182(a);
 - A. Waste solvent shall be stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
 - B. The owner of the degreaser shall be closed when parts are not being handled; and
 - C. Parts are drained until dripping ceases.
 - ii. Pursuant to 35 IAC 218.182(b)(1), the degreaser shall be equipped with a cover, which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand

or with the mechanical assistance of springs, counter-weights or a powered system if;

- A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 30°C (100°F);
 - B. The solvent is agitated; or
 - C. The solvent is heated above ambient room temperature.
- iii. Pursuant to 35 IAC 218.182(b)(2), the degreaser shall be equipped with a device for draining cleaned parts. The drainage device shall be constructed so that parts are enclosed under the cover while draining unless:
- A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F); or
 - B. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external.
- iv. Pursuant to 35 IAC 218.182(b)(3)(A), the degreaser shall be equipped with a control device which limits the freeboard height of 7/10 of the inside width of the tank or 91 cm (35 in), whichever is less, if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F) or if the solvent is heated above 50°C (120°F) or its boiling point.
- v. Pursuant to 35 IAC 218.182(b)(4), a permanent conspicuous label summarizing the operating procedure is affixed to the degreaser.
- vi. Pursuant to 35 IAC 218.182(b)(5), if a solvent spray is used, the degreaser shall be equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray, unless otherwise permitted by the Illinois EPA.
- c. An affected degreaser is subject to 35 IAC 212.321(a), which provides that:
- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission

unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) or 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- d. The owner or operator shall not cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from each affected degreaser. If no odor nuisance exists this limitation shall apply only to photochemically reactive material [35 IAC 218.301].
- e. An affected degreaser is subject to the emission limits defined in Conditions 5.2.2 and 5.5.

7.3.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected degreaser not being subject to the provisions of 40 CFR 63, Subpart T: National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning, because the affected degreaser does not apply any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 7-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The concentration of these solvents may be determined using EPA test method 18, material safety data sheets, or engineering calculations.

7.3.5 Operation and Control Requirements

- a. Pursuant to 35 IAC 218.182(a);
 - i. Waste solvent shall be stored in covered containers only and not disposed of in such manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
 - ii. The cover of the degreaser shall be closed when parts are not being handled; and
 - iii. Parts are drained until dripping ceases.

7.3.6 Emission Limitations

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

a. Emissions shall not exceed the following limits:

VOM Emissions	
<u>(ton/mo)</u>	<u>(ton/yr)</u>
0.38	1.5

Solvent usage is defined as net solvent that is processed through the degreaser (i.e., amount of clean solvent from the distillation unit to the parts washer minus amount of dirty solvent from the parts washer to the distillation unit).

The above limitations contain revisions to previously issued Permit 01050095. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the monthly VOM emission limit has been increased from 10% of the annual limit to 25% of the annual limit. Also, solvent usage limits have been removed. Annual VOM emission limits remain the same, no increase has occurred [T1R].

7.3.7 Testing Requirements

When requested by the Illinois EPA, performance testing shall be conducted in accordance with the applicable test methods and procedures specified in 35 IAC 218.105.

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 each affected degreaser to demonstrate compliance with Conditions 5.5 and 7.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Quantity of solvent used in the affected degreaser via mass balance (lb/mo and ton/yr).

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of an affected degreaser 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.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. Compliance with Condition 7.3.3(b) and (c) is assumed to be achieved by normal work practices and maintenance activities inherent in the parts washer operation.
- b. Compliance with Conditions 5.5 and 7.3.6 for the affected parts washer operation shall be addressed by the recordkeeping requirements of Condition 7.3.9 and the formula(s) given below:

VOM Emissions = Net Quantity of Solvent used via

$$\text{Mass Valance} \times \left(1 - \frac{\text{Overall Control Efficiency}}{\text{Efficiency}} \right).$$

7.4 Unit 04: Clean-Up Solvent

7.4.1 Description

04 - Clean-up solvent is used to clean press and coater equipment.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
04	Clean-up Operation	Cleanup will be performed within a permanent total enclosure and vented to the oxidizer system.

7.4.3 Applicability Provisions and Applicable Regulations

- a. The "affected clean-up operation" for the purpose of these unit-specific conditions is the use of solvents for the purpose of cleaning equipment as identified in Condition 7.4.2.
- b. At each point of clean-up with solvent, the Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from clean-up. If no odor nuisance exists this limitation shall apply only to photochemically reactive material [35 IAC 218.301].
- c. The affected clean-up solvent operation is subject to the emission limits identified in Conditions 5.2.2 and 5.5.

7.4.4 Non-Applicability of Regulations of Concern

None

7.4.5 Operation and Control Requirements

VOM containing cleaning materials, including used cleaning towels, associated with an affected printing or coating line shall be kept, stored or disposed of in closed containers.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected clean-up operation is subject to the following:

- a. Usage of VOM containing material and the emissions of VOM shall not exceed the following limits:

<u>Affected Clean-Up Operations</u>	<u>VOM Emissions</u>	
	<u>(ton/mo)</u>	<u>(ton/yr)</u>
L62/L63	2.31	9.25
P54/P55/P56 L64/L65	1.65	6.6

The above limitations contain revisions to previously issued Permit 01050095. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the monthly VOM emission limit has been increased from 10% of the annual limit to 25% of the annual limit. Also, solvent usage limits have been removed. Annual VOM emission limits remain the same, no increase has occurred [T1R].

7.4.7 Testing Requirements

N/A

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected clean-up operation to address compliance with Conditions 5.5 and 7.4, pursuant to Section 39.5(7)(b) of the Act:

- a. The name and identification number of each VOM containing material used as a clean-up solvent.
- b. The VOM content (wt. %) of each VOM containing material used as a clean-up solvent, as determined by Method 24 analysis of 40 CFR 60, Appendix A, or

Material Safety Data Sheet or Product Data Sheet information.

- c. Usage of each VOM containing material used as a clean-up solvent on L62 (lb/mo and ton/yr).
- d. Usage of each VOM containing material used as a clean-up solvent on P54/P55/P56/L63/L64/L65 (lb/mo and ton/yr).
- e. Emissions of VOM from the usage of clean-up solvent on L62 (lb/mo and ton/yr) calculated in accordance with the procedures given in Condition 7.4.12.
- f. Emissions of VOM from the usage of clean-up solvent on P54/P55/P56/L63/L64/L65 (lb/mo and ton/yr) calculated in accordance with the procedures given in Condition 7.4.12.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of an affected clean-up operation 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.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with Condition 7.4.3(b) is assumed to be achieved by normal work practices and maintenance activities inherent in the clean-up operation.
- b. i. Compliance with Conditions 5.5 and 7.4.6 for L62 clean-up operation shall be addressed by the recordkeeping requirements of Condition 7.4.9 and the formula(s) given below:

$$V_{L62} = \sum_{i=1}^n M_i * (1 - CE)$$

Where:

n = The total number of VOM containing materials applied as clean-up solvents on L62

V_{L62} = Total VOM emissions from the use of VOM containing material applied as clean-up solvents on L62 each month (lb/mo)

M_i = Quantity of each VOM containing material used as a clean-up solvent on L62 each month (lb/mo)

CE = The actual overall control efficiency (actual combined capture and control efficiency) of the control device(s) controlling L62 (percent)

- ii. Compliance with Conditions 5.5 and 7.4.6 for P54/P55/P56/L63/L64/L65 clean-up operation shall be addressed by the recordkeeping requirements of Condition 7.4.9 and the formula(s) given below:

$$V_{P54/L65} = \sum_{i=1}^n M_i$$

Where:

n = The total number of VOM containing materials applied as clean-up solvents on P54/P55/P56/L63/L64/L65 each month (lb/mo)

$V_{P54/L65}$ = Total VOM emissions from the use of VOM containing material applied as clean-up solvents on P55/P55/P56/L63/L64/L65 each month (lb/mo)

M_i = Quantity of each VOM containing material used as a clean-up solvent on P54/P55/P56/L63/L64/L65 each month (lb/mo)

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 May 14, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

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

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

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to determine compliance with numeric permit limits shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

<u>Monitoring Period</u>	<u>Report Due Date</u>
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
9511 West Harrison
Des Plaines, Illinois 60016
 - iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506
 - iv. USEPA Region 5 - Air Branch

USEPA (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) (p) (ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

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

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit 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)(1), (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
	I.D. 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? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. 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? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> 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.	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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: BY: _____ <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> _____ <small>AUTHORIZED SIGNATURE</small> </div> <div style="text-align: center;"> _____ <small>TITLE OF SIGNATORY</small> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> _____ <small>TYPED OR PRINTED NAME OF SIGNATORY</small> </div> <div style="text-align: center;"> _____ / _____ / _____ <small>DATE</small> </div> </div>

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