

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Standard Register Company
Attn: Donald E. Fowler
3106 North Route 12
Spring Grove, Illinois 60081

Application No.: 86080046 I.D. No.: 111080AAF
Applicant's Designation: FCABFGEN Date Received: April 14, 2000
Subject: Business Forms Equipment
Date Issued: June 2, 2000 Expiration Date: December 31, 2001
Location: 3106 North Route 12, Spring Grove

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of fourteen (14) non-heatset offset lithographic printing presses, one inkjet press with infra-red dryer, one carbon coater, a waste water evaporator and product finishing system comprised of nine (9) collators, one tipper, one bracket padder, two (2) communicators and one hunkler pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/yr for volatile organic material (VOM)). As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
2. This permit is issued based upon the lithographic printing presses being exempt from the control requirements of 35 Ill. Adm. Code Part 218, Subpart H: Printing and Publishing, Section 218.407. This is consequence of the combined daily emission rate of volatile organic materials (VOM) from subject presses never exceeding an applicability threshold of 100 lb/day (including solvents used for cleanup operations associated with the lithographic printing line(s)) established by Section 218.405(d)(2) and determined in accordance with Section 218.411(a)(1)(B).

3. Operation and emissions from all lithographic printing presses shall not exceed the following limits:

<u>Materials</u>	<u>Usage</u>		<u>VOM Content</u> (Wt. %)	<u>VOM Emissions</u>	
	(Ton/Mo)	(Ton/Yr)		(Lb/Mo)	(Ton/Yr)
Ink	4.1	49.0	40	0.1	1.0
Fountain Solution	0.7	7.0	12	0.1	0.8
Wash Solvents	1.1	11.2	100	1.1	<u>11.2</u>
				Total	13.0

These limits are based on the maximum production rate, usage of raw materials with maximum VOM content and 95% VOM retention of inks. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. Operation and emissions from product finishing system shall not exceed the following limits:

<u>Materials</u>	<u>Usage</u>		<u>VOM Content</u> (Wt. %)	<u>VOM Emissions</u>	
	(Ton/Mo)	(Ton/Yr)		(Lb/Mo)	(Ton/Yr)
Cold adhesive	2.5	26.1	2.5	0.06	0.6
Hot adhesive	10.0	100.0	0.02	0.2	2.0

These limits are based on the maximum production capacity and usage of raw materials with maximum VOM content. Compliance with annual limits shall be determined from a running total of 12 months of data.

5. This permit is issued based on negligible emissions of volatile organic materials from the inkjet printer, carbon coater and waste water evaporator. For this purpose, emissions from each emission source shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

6. The Permittee shall maintain monthly records of the following items:

- a. Names and amounts of lithographic inks, varnish, fountain solutions and clean-up solvents used (gal/mo or lb/mo);
- b. VOM content of materials in item (a)(lb/gal or wt. %);
- c. The number of days during that calendar month that lithographic printing lines were in operation;
- d. VOM emissions calculations for lithographic printing presses to demonstrate an exemption level of the daily VOM emissions performed pursuant to the procedures of Section 218.411 (a)(1)(B) (no VOM retention of cleaning solvents is allowed); and

- e. Actual VOM emission calculations (ton/mo, ton/yr).
- 7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA request for records during the course of a source inspection.
- 8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, a description of the exceedances or violation, and efforts to reduce emissions and future occurrences.
- 9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

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

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

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

- 10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: all VOM containing materials usage (gallons/month or lbs/month and gallons/yr or tons/yr) and all corresponding VOM contents (lbs/gallon or % by wt.).

It should be noted that the heating units and scrap paper recovery and bailing system are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146((d) and (aa).

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It also should be noted that this permit has been revised to reflect changes in the operational conditions and delete some emission units. This revision does not relax monitoring, recordkeeping, or reporting requirements contained in federally enforceable conditions of this permit. These permit conditions assure that this source would not be a major source for purpose of CAAPP.

If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

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

DES:VJB:jar

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A

This attachment provides a summary of the maximum emission from the printing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is a usage of 49.0 tons of printing inks, 7.0 tons of fountain solution, 11.2 tons of wash solvents, 26.1 tons of cold adhesives and 100 tons of hot melt adhesives per year with corresponding limits on VOM content in the raw materials. The resulting maximum emissions are below the threshold levels (i.e., 25 tons/yr for volatile organic material (VOM)) at which this source would be considered a major source for purposes of the Clean Air Act Program Permit (CAAPP). Actual emissions from this source will be less than predicted in this summary to the extent that VOM emissions at this facility are less than that required in this permit.

1. Operation and emissions from all lithographic printing presses shall not exceed the following limits:

<u>Materials</u>	<u>Usage</u>		<u>VOM Content</u> (Wt. %)	<u>VOM Emissions</u>	
	(Ton/Mo)	(Ton/Yr)		(Lb/Mo)	(Ton/Yr)
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2. Operation and emissions from product finishing system shall not exceed the following limits:

<u>Materials</u>	<u>Usage</u>		<u>VOM Content</u> (Wt. %)	<u>VOM Emissions</u>	
	(Ton/Mo)	(Ton/Yr)		(Lb/Mo)	(Ton/Yr)
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