

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Weber Marking Systems, Inc.
Attn: Brian Gallagher
711 West Algonquin Road
Arlington Heights, Illinois 60005

<u>Application No.:</u> 04070058	<u>I.D. No.:</u> 031009AAS
<u>Applicant's Designation:</u>	<u>Date Received:</u> February 21, 2007
<u>Subject:</u> Label Manufacturing and Printing Plant	
<u>Date Issued:</u> April 13, 2007	<u>Expiration Date:</u> December 29, 2009
<u>Location:</u> 711 West Algonquin Road, Arlington Heights	

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of thirty-two flexographic printing/coating presses, two cold degreasers, one glue applicator, five ink mixing tanks, two photo photopolymer plate making units with recovery still, and natural gas fired heating equipment as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit.
 - ii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to the initial issuance of a FESOP to this source, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. The paper coating lines are subject to the New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations 40 CFR 60, Subparts A and RR. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.

- b. Pursuant to 40 CFR 60.440(b), any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of 40 CFR 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR 60 Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to 40 CFR 60.442(a) and all other sections of 40 CFR 60 Subpart RR.
- c. The Permittee shall fulfill the monitoring and recordkeeping requirements of the New Source Performance Standards, 40 CFR 60.445(d): to maintain a 12 month record of the amount of solvent applied in the coating at the facility.
- 3. This permit is issued based upon the flexographic printing presses not being subject to the VOM control requirements of 35 Ill. Adm. Code 218.401: Flexographic and Rotogravure Printing. This is consequence of the potential to emit of VOM being limited to less than applicability threshold of 25 tons per year specified in Section 218.401(a)(2).
- 4. The paper coating operations performed at the plant are subject to VOM emission limitations of 35 Ill. Adm. Code 218.204(c) and VOM content of the coating shall not exceed 2.3 lb/gal (minus water and any compounds which are specifically exempted from the definition of VOM).
- 5. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, with the following exception: If no odor nuisance exists these limitations shall apply only to photochemically reactive material (35 Ill. Adm. Code 218.301).
- 6. VOM emissions from the flexographic printing operations shall not exceed 2.5 ton/month and 22.0 tons/year. The VOM emissions shall be calculated using the following equation:

$$E = \sum M_i \times V_i, \text{ where:}$$

E - VOM emissions (Tons);

M_i - VOM-containing raw materials usage (Tons);

V_i - VOM content of raw materials (fraction).

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

- 7a. Two cold degreasers shall be operated according to the operating, equipment and material requirements of 35 Ill. Adm. Code 218.182.

- b. The VOM usage and emissions from two cold degreasers operations shall not exceed 0.1 ton/mo and 1.0 ton/yr. These limits are based on the maximum solvent usage and VOM content of the solvent. Compliance with annual limits shall be determined from a running total of 12 months of data.
- 8. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, with the following exception: If no odor nuisance exists these limitations shall apply only to photochemically reactive material (35 Ill. Adm. Code 218.301).
- 9. This permit is issued based on negligible emissions of particulate matter from the six laser etching machines. For this purpose emissions shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 ton/year.
- 10. This permit is issued based on negligible emissions of volatile organic materials from the glue applicator, ink mixing tanks and photo photopolymer plate making units with recovery still. For this purpose, emissions from each emission source or group of emission sources shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- 11. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in a rule which would require the Permittee to obtain a CAAPP permit from the Agency. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Agency.
- 12. Operation and emissions of the natural gas fired heating equipment shall not exceed the following limits:

Natural Gas Usage: 10 mmscf/mo, 60 mmscf/yr

<u>Pollutant</u>	<u>Emission Factor</u> (lb/mmscf)	<u>Emissions</u>	
		(Ton/Mo)	(Ton/Yr)
Nitrogen Oxides (NO _x)	100	0.5	3.0
Carbon Monoxide (CO)	84	0.4	2.5
Volatile Organic Materials (VOM)	5.5	0.03	0.2

These limits are based on the maximum equipment operations and standard emission factors given by AP-42. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 months of data.

- 13. The Permittee shall maintain records of the following items:
 - a. Monthly and annual usage of the inks, coatings, adhesives and clean-up solvents (Ton/Mo, Ton/Yr);

- b. VOM and HAP content of the materials used (Wt.%);
 - c. Natural gas usage (mmscf/mo, mmscf/yr);
 - d. VOM and HAP emissions (tons/mo, (tons/yr) with supporting calculations.
14. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five 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 an Illinois EPA request for records during the course of a source inspection.
15. If there is an exceedance of or deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance and Enforcement Section in Springfield, Illinois within 30 days after the exceedance/deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or deviation and efforts to reduce emissions and future occurrences.
16. Two (2) copies of required reports and notifications shall be sent to:

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

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

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

This permit has been revised to include operations of ten new and two modified flexographic printing presses, two cold degreasers and six laser itching machines described in Construction Permits 06120041 and 07020021.

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

Edwin C. Bakowski, P.E.
Acting Manager, Permit Section
Division of Air Pollution Control

ECB:VJB:lsm

cc: IEPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from printing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 100 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled HAP, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is used and control measures are more effective than required in this permit.

EMISSIONS (tons/yr)

Emission Units	VOM	NO _x	CO	PM	Single HAP	Total HAP
Flexographic presses	22.0	--	--	--	--	--
Two cold degreasers	1.0	--	--	--	--	--
Glue applicator	0.44	--	--	--	--	--
Five ink mixers	0.44	--	--	--	--	--
Two photo polymer units	0.44	--	--	-----	--	--
Six laser itchers	--	--	--	0.44	--	--
Combustion equipment	0.2	3.0	2.5		--	--
Total	24.5	3.0	2.5	0.4	<10	<25

ECB:VJB:lsm