



- b. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
- 3a. This permit is issued based on the combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) being less than 100 lbs/day as determined in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B). Therefore, the requirements of 35 Ill. Adm. Code 218.407 and 218.410 are not applicable to the lithographic printing lines at this source.
- b. Pursuant to 35 Ill. Adm. Code 218.411(a)(1)(B) the Permittee shall perform calculations which demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, varnish, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source never exceed 100 lbs/day before the use of capture systems and control devices, as follows:
  - i. To calculate daily emissions of VOM, the Permittee shall determine the monthly emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) and divide this amount by the number of days during that calendar month that printing lines at the source were in operation;
  - ii. To determine the VOM content of the inks, fountain solution additives and cleaning solvents, the test methods and procedures set forth in 35 Ill. Adm. Code 218.409(c) shall be used;
  - iii. To determine VOM emissions from inks used on lithographic printing lines at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing lines; and
  - iv. To determine VOM emissions from fountain solutions and cleaning solvents used on lithographic printing lines at the source, no retention factor is used.
- 4a. Pursuant to 35 Ill. Adm. Code 218.411(a)(2) the Permittee shall collect and record either the information specified in (b) or (c) below for all lithographic printing lines at the source:

- b. Standard recordkeeping, including the following:
  - i. The name and identification of each fountain solution additives, lithographic ink, varnish, and cleanup solvent used on any lithographic printing lines, recorded each month;
  - ii. A daily record which shows whether a lithographic printing line at the source was in operation on that day;
  - iii. The VOM content and the amount of each fountain solution additive, lithographic ink, varnish, and cleaning solvent used on any lithographic printing line, recorded each month (lb/month or gal/month);
  - iv. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, varnish, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month; and
  - v. The VOM emissions in lbs/day for the month, calculated in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B) and Special Condition 3(b).
  
- c. Purchase and inventory recordkeeping, including the following:
  - i. The name, identification, and VOM content of each fountain solution additive, lithographic ink, varnish, and cleaning solvent used on any lithographic printing line, recorded each month;
  - ii. Inventory records from the beginning and end of each month indicating the total volume of each fountain solution additive, lithographic ink, varnish, and cleaning solvent used on any lithographic printing line at the source;
  - iii. Monthly purchase records for each fountain solution additive, lithographic ink, varnish, and cleaning solvent used on any lithographic printing line at the source;
  - iv. A daily record which shows whether a lithographic printing line at the source was in operation on that day;
  - v. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, varnish, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month based on the monthly inventory and purchase records required to be maintained pursuant to 35 Ill. Adm. Code 218.411(a)(2)(B)(i), (a)(2)(B)(ii), and (a)(2)(B)(iii) and Special Conditions 4(c)(i), (c)(ii), and (c)(iii); and

- vi. The VOM emissions in lbs/day for the month, calculated in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B).
- d. The Permittee shall maintain all records required by 35 Ill. Adm. Code 218.411 at the source for a minimum period of three years and shall make all records available to the Illinois EPA upon request.
- 5. Pursuant to 35 Ill. Adm. Code 218.411(a)(3), the Permittee shall notify the Illinois EPA in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, varnish, and solvents used for cleanup operations associated with the lithographic printing lines) at the source ever exceed 100 lbs/day, before the use of capture systems and control devices, within 30 days after the event occurs. Such notification shall include a copy of all records of such event.
- 6a. Within 30 days of a written request from the Agency the Permittee shall submit data on the volatile organic material content of representative inks, solvents, and fountain solutions as applied, determined by laboratory analysis in accordance with the 35 Il Adm. Code Section 218.105.
  - b. The submitted data shall include the VOM content of the inks, solvents, and fountain solutions, a justification of why these are representative, and a description of the sampling procedures and documentation for the analysis.
  - c. The Agency may provide additional time for the performance of this testing upon request from the Permittee which shows that it is not feasible to perform representative testing within 30 days.
- 7. The Permittee shall maintain monthly records of the following items:
  - a. Type and usage of all inks and cleaning solutions (ton/mo and ton/yr);
  - b. VOM and HAP content of each inks and cleaning solutions;
  - c. Volatile organic material emissions (ton/mo and ton/yr); and  
  
Volatile organic material emissions shall be calculated as follows:  
  
$$\text{Usage} \times \text{VOM Content} = \text{Emissions}$$
  - d. The amount of volatile organic material emissions that are Hazardous Air Pollutants (HAP) by type of HAP (ton/mo and ton/yr).

8. 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 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 respond to an Illinois EPA request for records during the course of a source inspection.
9. 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 description of the exceedance or violation and efforts to reduce emissions and future occurrences.
10. 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 Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

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

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

11. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: usages of each inks and cleanup solvent (ton/mo and ton/yr) and VOM emissions (ton/mo and ton/yr).

It should be noted that this permit has been revised to no longer include the operation of one non-heatset offset lithographic press.

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If you have any questions on this, please call Tara T. Nguyen-Ede at 217/782-2113.

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

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

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the printing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 25 tons/year of VOM, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program.

1. Total combined operations and emissions from the 3 non-heatset offset lithographic printing presses shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u> <u>(Wt. %)</u>	<u>VOM Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Ink	1.46	17.5	23	0.02	0.2
Wash Solvents	1.46	17.5	90	<u>1.31</u>	<u>15.75</u>
			Total:	1.33	15.95

These limits define the potential emissions of VOM and are based on maximum material usage, 95 percent retention of the ink, and maximum volatile organic material content of the inks and solvents. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

2. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

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