

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Vision Integrated Graphics, LLC
Attn: Steven Smits
8301 West 183rd Street
Tinley Park, Illinois 60477-6225

Application No.: 07070026

I.D. No.: 031600GSX

Applicant's Designation:

Date Received: July 13, 2007

Subject: Commercial Proofing & Printing

Date Issued:

Expiration Date:

Location: 208 South Jefferson Street, Chicago, Cook County 60661

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of eight digital sheet-fed non-heatset offset lithographic printing presses/coaters pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 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 requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - ii. To limit the emissions of VOM from the construction of new emission units and other modifications at the source, which occurred without first obtaining construction permit(s) between November 15, 1992 and June 15, 2005 (the period during which the Chicago area was classified as severe nonattainment for ozone), to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification.
 - iii. To limit 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 issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits for this location.

- 2a. Pursuant to 35 Ill. Adm. Code 218.204(c), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. The emission limitations are as follows:

	kg/l	lb/gal
Paper Coating	0.28	(2.3)

- b. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.
- c. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall only apply to photochemically reactive material.
- d. Pursuant to 35 Ill. Adm. Code 218.405(d) (2), 35 Ill. Adm. Code 218.407 through 218.410 shall apply to all owners or operators of heatset web offset, non-heatset weboffset, or sheet-fed offset lithographic printing line(s), unless the combined emissions of VOM from all lithographic printing line(s) at the source (including solvents used for cleanup operations associated with the lithographic printing line(s)) never exceed 45.5 kg/day (100 lbs/day), as determined in accordance with 35 Ill. Adm. Code 218.411(a) (1) (B), before the application of capture systems and control devices.
- e. Pursuant to 35 Ill. Adm. Code 218.408(b), no owner or operator of a lithographic printing line which is exempt from the limitations of 35 Ill. Adm. Code 218.407 because of the criteria in 35 Ill. Adm. Code 218.405(d), shall operate said printing line on or after March 15, 1996, unless the owner or operator has complied with, and continues to comply with, 35 Ill. Adm. Code 218.405(d) and 218.411(a).

3. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 4a. Emissions and operation of the two digital sheet-fed non-heatset offset lithographic printing presses/coaters (Presses #7 and #8) shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>Ton/Month</u>	<u>Tons/Year</u>	<u>Ton/Month</u>	<u>Tons/year</u>
0.61	6.07	0.61	6.07

- b. Emissions and operation of the six existing digital lithographic printing presses/coaters (Presses #1, #2, #3, #4, #5, and #6) shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>Ton/Month</u>	<u>Tons/Year</u>	<u>Ton/Month</u>	<u>Tons/year</u>
0.99	9.88	0.99	9.88

- c. These limits are based on the maximum production rate, the highest VOM content of raw materials and 95% conventional lithographic ink VOM retention. Note that there is a "nested" limit on the emissions of the combination of HAPs as a result of the limit on VOM emissions. The HAPs emitted at this source have been determined to be VOMs and therefore limiting VOM emissions also limits HAP emissions.
- d. The above limitations are being established in permit pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the affected digital sheet-fed non-heatset offset lithographic printing presses/coaters below the levels that would trigger the applicability of these rules.
- e. VOM and HAP emissions shall be determined from the following equation on a monthly basis:

$$E = \Sigma (I \times C_I) \times 0.05 + \Sigma (S \times C_S) - W \times C_W,$$

where:

E = VOM emission (tons);

I = Conventional lithographic ink usage (tons/month)

C_I = VOM content of the conventional lithographic ink (fraction)

S = Solvent-containing materials usage (tons/month)

C_s = VOM content of the solvent-containing materials (fraction)

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

C_w = Certified VOM content of the waste (fraction)

5. The emissions of 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. 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 Clean Air Act Permit Program permit from the Illinois EPA and the requirements of Section 112(g) of the Clean Air Act.
6. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
7. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.
8. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR

63.10(b) (3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- b. Pursuant to 35 Ill. Adm. Code 218.211(c) (2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 of and complying by means of 35 Ill. Adm. Code 218.204 shall collect and record following information each day 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 coating as applied on the coating lines.
 - ii. 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 each day on the coating lines.
- c. Pursuant to 35 Ill. Adm. Code 218.411(a) (2), an owner or operator of lithographic printing line(s) exempt from the limitations of 35 Ill. Adm. Code 218.407 because of the criteria in 35 Ill. Adm. Code 218.405(d) shall collect and record either the information specified in 35 Ill. Adm. Code 218.411(a) (2) (A) or (a) (2) (B) for all lithographic printing lines at the source:
 - i. Standard recordkeeping, including the following:
 - A. The name and identification of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;
 - B. A daily record which shows whether a lithographic printing line at the source was in operation on that day;
 - C. The VOM content and the volume of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;
 - D. 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, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month; and
 - E. The VOM emissions in lbs/day for the month, calculated in accordance with 35 Ill. Adm. Code 218.411(a) (1) (B);
 - ii. Purchase and inventory recordkeeping, including the following:
 - A. The name, identification, and VOM content of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;

- B. Inventory records from the beginning and end of each month indicating the total volume of each fountain solution additive, lithographic ink, and cleaning solvent to be used on any lithographic printing line at the source;
 - C. Monthly purchase records for each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line at the source;
 - D. A daily record which shows whether a lithographic printing line at the source was in operation on that day;
 - E. 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, 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
 - F. The VOM emissions in lbs/day for the month, calculated in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B);
- 9a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Names and amounts of conventional lithographic inks, digital inks and oils, fountain solutions and clean-up solvents used (tons/month, tons/year);
 - ii. VOM/HAP content of materials in Condition 11(a)(i) (weight %);
 - iii. Certified amount of waste solvent shipped off-site (tons);
 - iv. Certified VOM content of the waste material (weight fraction); and
 - v. Monthly and annual VOM and HAP emissions with supporting calculations (tons/month, tons/year). HAP emissions shall be calculated as a fraction of total VOM emission proportional to VOM/HAP ratio in the raw materials.
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) 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 or USEPA request for records during the course of a source inspection.

10. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- 11a. Pursuant to 35 Ill. Adm. Code 218.211(c) (3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 of and complying by means of 35 Ill. Adm. Code 218.204 shall notify the Illinois EPA in the following instances:
 - i. Any record showing violation of 35 Ill. Adm. Code 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.
 - ii. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) (1) or (e) (1), respectively. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) or (e), respectively.
- b. Pursuant to 35 Ill. Adm. Code 218.411(a) (3) an owner or operator or lithographic printing line(s) exempt from the requirements of 35 Ill. Adm. Code 218.407 because of the criteria in 35 Ill. Adm. Code 218.405(d) shall notify the Illinois EPA in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source ever exceed 45.5 kg/day (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.
12. Two (2) copies of required reports and 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:

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

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:

cc: IEPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

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. 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 material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)		
	<u>VOM</u>	<u>Single HAP</u>	<u>Total HAPs</u>
Presses #1, #2, #3, #4, #5, and #6	9.88		
<u>Presses #7 and #8</u>	<u>6.07</u>	<u>--</u>	<u>--</u>
Totals	15.95	7.9	19.9

VJB: