

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Berlin Industries, Inc.
Attn: Michael J. Cieslewicz, Compliance Administrator
175 Mercedes Drive
Carol Stream, Illinois 60188-9401

<u>Application No.:</u> 96060075	<u>I.D. No.:</u> 043020ABK
<u>Applicant's Designation:</u>	<u>Date Received:</u> June 30, 2003
<u>Subject:</u> Commercial Lithographic Printing Plant	
<u>Date Issued:</u> October 4, 2007	<u>Expiration Date:</u> October 4, 2012
<u>Location:</u> 175 Mercedes Drive, Carol Stream, DuPage County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of heatset web offset lithographic printing lines #356, #357, #358, #361, #362, #363, #364, #366, #380, regenerative thermal oxidizer, 1 non-heatset offset lithographic printing press, inkjet printing units, printing dryers, natural gas fired combustion equipment, and glass cleaning operation, parts washer, scrap paper collection and bailing system with cyclone 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. This federally enforceable state operating permit (FESOP) is issued 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, 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for total 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 establish federally enforceable Emission Reduction Market System (ERMS) provisions, including baseline emissions, allotment for each seasonal allotment period, identification of any units deemed to be insignificant activities for the purposes of the ERMS, emissions calculation methodologies, and provisions addressing all other applicable requirements of 35 Ill. Adm. Code Part 205, which are described in Attachment B.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.

- 2a. 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 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. Pursuant to 35 Ill. Adm. Code 212.321(a), 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 which, 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) of 35 Ill. Adm. Code 212.321.
3. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.
- 4a. Pursuant to 35 Ill. Adm. Code 218.407(a)(1), no owner or operator of lithographic printing line(s) subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart H shall cause or allow the operation of any heatset web offset lithographic printing line unless:
 - i. The total VOM content in the as-applied fountain solution shall not exceed:
 - A. 1.6 percent, by volume.
 - B. 3 percent or less, by volume, and the temperature of the fountain solution is maintained below 15.6°C (60°F), measured at the reservoir or the fountain tray; or
 - C. 5 percent or less, by volume, and the as-applied fountain solution contains no alcohol.
 - ii. The air pressure in the dryer is maintained lower than the air pressure of the press room, such that the air flow through all openings in the dryer, other than the exhaust, is into the dryer at all times when the printing line is operating.
 - iii. An afterburner is installed and operated so that VOM emissions (excluding methane and ethane) from the press dryer exhaust(s) are reduced by 90 percent, by weight, or to a maximum afterburner exhaust outlet concentration of 20 ppmv (as carbon);
 - iv. The afterburner is equipped with the applicable monitoring equipment specified in 35 Ill. Adm. Code 218.105(d)(2) and the monitoring equipment is installed, calibrated, operated, and maintained according to manufacturer's specifications at all times when the regenerative thermal oxidizer is in use; and

- v. The afterburner is operated at all times when the printing line is in operation, except the afterburner may be shut down between November 1 and April 1 as provided in 35 Ill. Adm. Code 218.107.

- b. Pursuant to 35 Ill. Adm. Code 218.407(a)(2), no owner or operator of lithographic printing line(s) subject to the requirements of 35 Ill. Adm. Code 218 Subpart H shall cause or allow the operation of any non-heatset web offset lithographic printing line unless the VOM content of the as-applied fountain solution is 5 percent or less, by volume, and the as-applied fountain solution contains no alcohol;

- c. Pursuant to 35 Ill. Adm. Code 218.407(a)(4), no owner or operator of lithographic printing line(s) subject to the requirements of 35 Ill. Adm. Code 218 Subpart H shall cause or allow the use of a cleaning solution on any lithographic printing line unless:
 - i. The VOM content of the as-used cleaning solution is less than or equal to 30 percent, by weight; or
 - ii. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F).

- d. Pursuant to 35 Ill. Adm. Code 218.407(a)(5), no owner or operator of lithographic printing line(s) subject to the requirements of 35 Ill. Adm. Code 218 Subpart H shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored or disposed of in any manner other than in closed containers.

- e. 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, 218.304 and the following exception: if no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemical reactive material.

- 5a. The regenerative thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test, before the printing process is begun, and this temperature shall be maintained during operation of the affected printing lines.
 - b. The Permittee shall follow good operating practices for the regenerative thermal oxidizer, including periodic inspection, routine maintenance, and prompt repair of defects.
 - c. The affected printing lines shall only be operated with natural gas as the fuel in each press dryer and the regenerative thermal oxidizer.

- 6a. Emissions of volatile organic material (VOM) from heatset web offset printing line #380 shall not exceed 1.50 tons per month and 8.96 tons per year. These limits are based on the maximum material usage, the maximum VOM contents, 20% by weight ink solvent retention in the web, regenerative thermal oxidizer control and the formulas in Condition 7. The above limitations were established in Permit 04080067, pursuant to 35 Ill. Adm. Code 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 modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203.
- b.
- i. Emissions of VOM from printing lines #356, 357 and 358 shall not exceed 2.25 tons per month and 17.99 tons per year. These limits are based on the maximum material usage, the maximum VOM contents, 20% by weight ink solvent retention in the web, regenerative thermal oxidizer control and the formulas in Condition 7(a).
 - ii. Total emissions of VOM from the sheet-fed offset presses (INDIGO #1 and INDIGO #2) shall not exceed 0.33 tons per month and 2.71 tons per year. These limits are based on information in the application including maximum material usage. Compliance with these limits shall be calculated based on the formulas in Condition 7(b).
 - iii. Emissions of VOM from the non-heatset lithographic printing lines (6C DIDDE and 1C MIEHLE) shall not exceed 0.20 tons per month and 1.56 tons per year. These limits are based on the maximum material usage and emission factors and formulas in Condition 7(b).
 - iv. The above limitations were established in Permit 03090019, pursuant to 35 Ill. Adm. Code 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 modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203.
- c. Emissions of VOM from printing lines #361, 362, 363, 364 and 366 shall not exceed 5.00 tons per month and 34.17 tons per year. These limits are based on the maximum material usage, the maximum VOM contents, 20% by weight ink solvent retention in the web, regenerative thermal oxidizer control and the formulas in Condition 7. The above limitations contain revisions to previously issued Permit 94030060. 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 Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. 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 material usage and VOM content limits have been removed. However, VOM emission limits remain unchanged.

d. Operation and emissions of the natural gas fired combustion equipment shall not exceed the following limits:

i. Natural Gas Usage: 25 mmscf/month and 250 mmscf/year

ii. Emissions of nitrogen oxide (NO_x), carbon monoxide (CO), particulate matter (PM), volatile organic material (VOM), and sulfur dioxide (SO₂):

<u>Pollutant</u>	<u>Emission Factor</u>		<u>Emissions</u>	
	<u>(Lbs/mmscf)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	
Nitrogen Oxides (NO _x)	100	1.25	12.5	
Carbon Monoxide (CO)	84	1.05	10.5	
Particulate Matter (PM)	7.6	0.10	0.95	
Volatile Organic Material (VOM)	5.5	0.07	0.69	
Sulfur Dioxide (SO ₂)	0.6	0.01	0.08	

These are the emission factors for uncontrolled natural gas combustion in small boilers with less than 100 mmBtu/hour of heat input, Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, March, 1998.

e. This Permit is issued based on negligible emissions of VOM from the parts washers and glass cleaning operation. For this purpose, VOM emissions from each of these units shall not exceed nominal emission rates of 0.44 tons/year.

f. This permit is issued based on negligible emissions of particulate matter from the scrap paper collection and bailing system. For this purpose, particulate matter emissions from this process shall not exceed nominal emission rates of 0.44 tons/year.

g. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/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 CAAPP permit from the Illinois EPA.

7a. To determine compliance with Condition 6, VOM and HAP emissions from the heatset web offset printing lines shall be calculated based on the following:

VOM or HAP (lb) = [(Coating or Ink Usage, gal) x (Coating or Ink Density, lb/gal) x (VOM or HAP Content of Coating or Ink, wt. %) x (Adjustment Factor for VOM or HAP Retention in Substrate)] + [(Fountain Solution Usage, gal) x (Fountain Solution Density, lb/gal) x (lb captured/lb used)] + [Wash Solvent Usage, gal) x (Wash Solvent Density, lb/gal) x (lb captured/lb used)] x [1 - (Overall Afterburner Efficiency* (%) / 100)] + [(Fountain Solution Usage, gal) x (Fountain Solution Density, lb/gal) x (1 - lb captured/lb used)] + [Wash Solvent Usage, ton) x (1 - lb captured/lb used)]

* As specified by manufacturer or vendor of the afterburners or by testing pursuant to Condition .

- b. To determine compliance with Condition 6, VOM and HAP emissions from the sheet-fed offset presses and non-heatset lithographic printing lines shall be calculated based on the following:

Ink VOM or HAP Emissions (E_I):

$$E_I = M_I W_I$$

Fountain Solution VOM or HAP Emissions (E_F):

$$E_F = M_F W_F$$

Cleaning Solvent VOM or HAP Emissions (E_M):

$$E_M = M_M W_M$$

Total VOM or HAP Emissions (E_T):

$$E_T = E_I + E_F + E_M$$

Where:

M_I = Weight of ink used (pounds);

W_I = Weight percent VOM or HAP in ink (wt. %);

M_F = Volume of fountain solution used, as applied (gallons);

W_F = VOM or HAP content of fountain solution, as applied (lb VOM or HAP/gallon);

M_M = Volume of cleaning solvent used (gallons);

W_M = VOM or HAP content of cleaning solvent (lb VOM or HAP/gallon);

8. 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).

- 9a. Pursuant to 35 Ill. Adm. Code 218.409(a), testing to demonstrate compliance with requirements of 35 Ill. Adm. Code 218.407 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting such testing to allow the Illinois EPA to be present during such testing.
- b. Pursuant to 35 Ill. Adm. Code 218.409(b), the methods and procedures of 35 Ill. Adm. Code 218.105(d) and (f) shall be used for testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1), as follows:
 - i. To select the sampling sites, Method 1 or 1A, as appropriate, 40 CFR 60, Appendix A. The sampling sites for determining efficiency in reducing VOM from the dryer exhaust shall be located between the dryer exhaust and the control device inlet, and between the outlet of the control device and the exhaust to the atmosphere;
 - ii. To determine the volumetric flow rate of the exhaust stream, Method 2, 2A, 2C, or 2D, as appropriate, 40 CFR 60, Appendix A;
 - iii. To determine the VOM concentration of the exhaust stream entering and exiting the control device, Method 25 or 25A, as appropriate, 40 CFR 60, Appendix A. For thermal and catalytic afterburners, Method 25 must be used except under the following circumstances, in which case Method 25A must be used:
 - A. The allowable outlet concentration of VOM from the control device is less than 50 ppmv, as carbon;
 - B. The VOM concentration at the inlet of the control device and the required level of control result in exhaust concentrations of VOM of 50 ppmv, or less, as carbon; and
 - C. Due to the high efficiency of the control device, the anticipated VOM concentration at the control device exhaust is 50 ppmv or less, as carbon, regardless of inlet concentration. If the source elects to use Method 25A under this option, the exhaust VOM concentration must be 50 ppmv or less, as carbon, and the required destruction efficiency must be met for the source to have demonstrated compliance. If the Method 25A test results show that the required destruction efficiency apparently has been met, but the exhaust concentration is above 50 ppmv, as carbon, a retest is required. The retest shall be conducted using either Method 25 or Method 25A. If the retest is conducted using Method 25A and the test results again show that the required destruction efficiency apparently has been met,

but the exhaust concentration is above 50 ppmv, as carbon, the source must retest using Method 25;

- iv. Notwithstanding the criteria or requirements in Method 25 which specifies a minimum probe temperature of 129° C (265° F), the probe must be heated to at least the gas stream temperature of the dryer exhaust, typically close to 176.7°C (350° F);
 - v. During testing, the printing line(s) shall be operated at representative operating conditions and flow rates; and
 - vi. During testing, an air flow direction indicating device, such as a smoke stick, shall be used to demonstrate 100 percent emissions capture efficiency for the dryer in accordance with 35 Ill. Adm. Code 218.407(a)(1)(B).
- c. Pursuant to 35 Ill. Adm. Code 218.409(c), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), (a)(3) and (a)(4)(A), and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of 35 Ill. Adm. Code 218.411(a)(1)(B)), shall be conducted upon request of the Illinois EPA, as follows:
- i. The applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) shall be used; provided, however, Method 24, shall be used to demonstrate compliance; or
 - ii. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a); provided, however, Method 24 shall be used to determine compliance.
- d. Pursuant to 35 Ill. Adm. Code 218.409(e), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 Ill. Adm. 218.110.
- 10a. Pursuant to 35 Ill. Adm. Code 218.410(a), Fountain Solution Temperature:
- i. The owner or operator of any lithographic printing line(s) relying on the temperature of the fountain solution to demonstrate compliance shall install, maintain, and continuously operate a temperature monitor of the fountain solution in the reservoir or fountain tray, as applicable.
 - ii. The temperature monitor must be capable of reading with an accuracy of 1°C or 2°C, and must be attached to an automatic,

continuous recording device such as a strip chart, recorder, or computer, with at least the same accuracy, that is installed, calibrated and maintained in accordance with the manufacturer's specifications. If the automatic, continuous recording device malfunctions, the owner or operator shall record the temperature of the fountain solution at least once every two operating hours. The automatic, continuous recording device shall be repaired or replaced as soon as practicable.

- b. Pursuant to 35 Ill. Adm. Code 218.410(b), Fountain Solution VOM Content. The owner or operator of any lithographic printing line(s) subject to 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2) or (a)(3) shall:
 - i. For a fountain solution to which VOM is not added automatically:
 - A. Maintain records of the VOM content of the fountain solution in accordance with 35 Ill. Adm. Code 218.411(c)(2)(C); or
 - B. Take a sample of the as-applied fountain solution from the fountain tray or reservoir, as applicable, each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution in the fountain tray or reservoir, and shall determine compliance with the VOM content limitation of the as-applied fountain solution by using one of the following options:
 - I. With a refractometer or hydrometer with a visual, analog, or digital readout and with an accuracy of 0.5 percent. The refractometer or hydrometer must be calibrated with a standard solution for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications, against measurements performed to determine compliance. The refractometer or hydrometer must be corrected for temperature at least once per 8-hour shift or once per batch of fountain solution prepared or modified, whichever is longer; or
 - II. With a conductivity meter if it is demonstrated that a refractometer and hydrometer cannot distinguish between compliant and noncompliant fountain solution for the type and amount of VOM in the fountain solution. A source may use a conductivity meter if it demonstrates that both hydrometers and refractometers fail to provide significantly different measurements for standard solutions containing 95 percent, 100 percent and 105 percent of the applicable VOM content limit. The conductivity meter reading for the fountain solution must be referenced to the conductivity of the incoming water.

A standard solution shall be used to calibrate the conductivity meter for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications;

- ii. For fountain solutions to which VOM is added at the source with automatic feed equipment, determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level. Records must be retained of the VOM content of the fountain solution in accordance with 35 Ill. Adm. Code 218.411(c)(2)(D). The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications.
- c. Pursuant to 35 Ill. Adm. Code 218.410(c), if an afterburner is used to demonstrate compliance, the owner or operator of a heatset web offset lithographic printing line subject to 35 Ill. Adm. Code 218.407(a)(1)(C) shall:
 - i. Install, calibrate, maintain, and operate temperature monitoring device(s) with an accuracy of 3°C or 5°F on the afterburner in accordance with 35 Ill. Adm. Code 218.105(d)(2) and in accordance with the manufacturer's specifications. Monitoring shall be performed at all times when the afterburner is operating; and
 - ii. Install, calibrate, operate and maintain, in accordance with the manufacturer's specifications, a continuous recorder on the temperature monitoring device(s), such as a strip chart, recorder or computer, with at least the same accuracy as the temperature monitor.
- d. Pursuant to 35 Ill. Adm. Code 218.410(e), Cleaning Solution
 - i. The owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with 35 Ill. Adm. Code 218.407(a)(4)(A) must:
 - A. For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):
 - I. Install, operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed; and
 - II. Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with 35 Ill. Adm. Code 218.407(a)(4)(A).

- B. For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) as set forth in 35 Ill. Adm. Code 218.411(d)(2).
 - ii. The owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with 35 Ill. Adm. Code 218.407(a)(4)(B) must keep records for such cleaning solutions used on any such line(s) as set forth in 35 Ill. Adm. Code 218.411(d)(2)(C).
- 11a. 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 218.411(b)(3), an owner or operator of a heatset web offset lithographic printing line(s) subject to the control requirements of 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1) shall collect and record daily the following information for each heatset web offset lithographic printing line subject to 35 Ill. Adm. Code 218.407(a)(1)(C) or (b)(1):
 - i. Afterburner or other approved control device monitoring data in accordance with 35 Ill. Adm. Code 218.410(c) or (d), as applicable;

- ii. A log of operating time for the afterburner or other approved control device, monitoring equipment, and the associated printing line;
 - iii. A maintenance log for the afterburner or other approved control device and monitoring equipment detailing all routine and non-routine maintenance performed, including dates and duration of any outages; and
 - iv. A log detailing checks on the air flow direction or air pressure of the dryer and press room to insure compliance with the requirements of 35 Ill. Adm. Code 218.407(a)(1)(B) at least once per 24-hour period while the line is operating.
- c. Pursuant to 35 Ill. Adm. Code 218.411(c)(2), an owner or operator of a lithographic printing line subject to 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), or (a)(3), shall collect and record the following information for each fountain solution:
- i. The name and identification of each batch of fountain solution prepared for use on one or more lithographic printing lines, the lithographic printing line(s) or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch;
 - ii. If an owner or operator uses a hydrometer, refractometer, or conductivity meter, pursuant to 35 Ill. Adm. Code 218.410(b)(1)(B), to demonstrate compliance with the applicable VOM content limit in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), or (a)(3):
 - A. The date and time of preparation and each subsequent modification of the batch;
 - B. The results of each measurement taken in accordance with 35 Ill. Adm. Code 218.410(b);
 - C. Documentation of the periodic calibration of the meter in accordance with the manufacturer's specifications, including date and time of calibration, personnel conducting, identity of standard solution, and resultant reading; and
 - D. Documentation of the periodic temperature adjustment of the meter, including date and time of adjustment, personnel conducting and results.
 - iii. If the VOM content of the fountain solution is determined pursuant to 35 Ill. Adm. Code 218.410(b)(1)(A), for each batch of as-applied fountain solution:

- A. Date and time of preparation and each subsequent modification of the batch;
 - B. Volume and VOM content of each component used in, or subsequently added to, the fountain solution batch;
 - C. Calculated VOM content of the as-applied fountain solution; and
 - D. Any other information necessary to demonstrate compliance with the applicable VOM content limits in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2) and (a)(3).
- iv. If the VOM content of the fountain solution is determined pursuant to 35 Ill. Adm. Code 218.410(b)(2), for each setting:
- A. VOM content limit corresponding to each setting;
 - B. Date and time of initial setting and each subsequent setting;
 - C. Documentation of the periodic calibration of the automatic feed equipment in accordance with the manufacturer's specifications; and
 - D. Any other information necessary to demonstrate compliance with the applicable VOM content limits in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2) and (a)(3).
- v. If the owner or operator relies on the temperature of the fountain solution to comply with the requirements in 35 Ill. Adm. Code 218.407(a)(1)(A)(ii) or (a)(3)(B):
- A. The temperature of the fountain solution at each printing line, as monitored in accordance with 35 Ill. Adm. Code 218.410(a); and
 - B. A maintenance log for the temperature monitoring devices and automatic, continuous temperature recorders detailing all routine and non-routine maintenance performed, including dates and duration of any outages.
- d. Pursuant to 35 Ill. Adm. Code 218.411(d)(2), for lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of 35 Ill. Adm. Code 218.407 shall collect and record the following information for each cleaning solution used on each lithographic printing line:
- i. For each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 Ill. Adm. Code 218.407(a)(4)(A) and which is prepared at the source with automatic equipment:

- A. The name and identification of each cleaning solution;
 - B. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(c);
 - C. Each change to setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
 - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
 - E. The VOM content of the as-used cleaning solution, with supporting calculations; and
 - F. A calibration log for the automatic equipment, detailing periodic checks.
- ii. For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 Ill. Adm. Code 218.407(a)(4)(A), and which is not prepared at the source with automatic equipment:
- A. The name and identification of each cleaning solution;
 - B. Date and time of preparation, and each subsequent modification, of the batch;
 - C. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(c);
 - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
 - E. The VOM content of the as-used cleaning solution, with supporting calculations.
- iii. For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with 35 Ill. Adm. Code 218.407(a)(4)(B):
- A. The name and identification of each cleaning solution;
 - B. Date and time of preparation, and each subsequent modification, of the batch;

- C. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with 35 Ill. Adm. Code 218.409(e);
 - D. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
 - E. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(e).
- iv. The date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any.
- e. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. VOM contents of inks, cleaning solutions, coatings and other VOM containing materials (% by weight);
 - ii. Monthly and annual usages of inks, cleaning solutions, fountain solutions and other VOM containing materials (lbs/month and tons/year);
 - iii. HAP content of the materials used (% by weight);
 - iv. Natural gas usage (mmscf/month and mmscf/year); and
 - v. Monthly and annual CO, NO_x, PM, SO₂, VOM, and HAP emissions with supporting calculations (tons/month and tons/year).
 - f. 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 an Illinois EPA or USEPA request for records during the course of a source inspection.
- 12a. 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 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 exceedance or deviation and efforts to reduce emissions and future occurrences.

- b. Pursuant to 35 Ill. Adm. Code 218.411(c), an owner or operator of a lithographic printing line subject to of 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), or (a)(3), shall:
 - i. Notify the Illinois EPA in writing of any violation of 35 Ill. Adm. Code 218.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation; and
 - ii. If changing its method of demonstrating compliance with the applicable VOM content limitations in 35 Ill. Adm. Code 218.407, or changing the method of demonstrating compliance with the VOM content limitations for fountain solutions pursuant to 35 Ill. Adm. Code 218.409, certify compliance for such new method in accordance with 35 Ill. Adm. Code 218.411(c)(1), within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing line(s) will be in compliance with the applicable requirements of 35 Ill. Adm. Code 218.407(a).
- c. Pursuant to 35 Ill. Adm. Code 218.411(d), for lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of 35 Ill. Adm. Code 218.407 shall:
 - i. Notify the Illinois EPA in writing of any violation of 35 Ill. Adm. Code 218.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation; and
 - ii. If changing its method of demonstrating compliance with the requirements of 35 Ill. Adm. Code 218.407(a)(4), or changing between automatic and manual methods of preparing cleaning solutions, certify compliance for such new method in accordance with 35 Ill. Adm. Code 218.411(d)(1), within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing line(s) will be in compliance with the applicable requirements of 35 Ill. Adm. Code 218.407(a)(4).
- 13. Two (2) copies of required reports and notifications 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:

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

If you have any questions on this, please call David Hulskotter at
217/782-2113.

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

Date Signed: _____

ECB:DWH:jws

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the source 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 HAPs) 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 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>Single HAP</u>	<u>Total HAPs</u>
	<u>VOM</u>	<u>NO_x</u>	<u>CO</u>	<u>PM</u>	<u>SO₂</u>			
Printing Lines 356, 357, 358	22.70							
Printing Lines 361, 362, 363, 364, 366	34.17							
Printing Line 380	8.96							
Inkjet Printing Units and Non-Heatset Offset Press	6.21							
Natural Gas Fired Combustion Equipment	0.69	12.5	10.5	0.95	0.08			
Parts Washers	0.44							
Glass Cleaning Operation	0.44							
Scrap Paper Collection & Bailing System				0.44				
Totals	<u>73.61</u>	<u>12.5</u>	<u>10.5</u>	<u>1.39</u>	<u>0.08</u>	<u>9.0</u>	<u>22.5</u>	

DWH:jws

Attachment B - Emissions Reduction Market System (ERMS)

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 Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. 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 in the sources' 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 Ill. Adm. Code 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 Ill. Adm. Code 205.500 and 35 Ill. Adm. Code 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 Ill. Adm. Code 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 Ill. Adm. Code 205.630).

2. Applicability

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

3. Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 Ill. Adm. Code 205.150(c)(1) and 35 Ill. Adm. Code 205.720, and as further addressed by Condition 8 of this Attachment, 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 5 of this Attachment.
 - i. VOM emissions from emission units that the Illinois EPA determines would qualify as insignificant activities under 35 Ill. Adm. Code 201.Subpart F if the source were a CAAPP source and for which a statement to this effect is contained in the FESOP for a participating or new participating source are exempt from the requirements of 35 Ill. Adm. Code Part 205, in accordance with 35 Ill. Adm. Code 205.220(b);
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit for sources permitted to operate during startup, malfunction or breakdown pursuant to 35 Ill. Adm. Code 201.262, in accordance with 35 Ill. Adm. Code 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 Ill. Adm. Code 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 Ill. Adm. Code 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 8(b) of this Attachment, if applicable, in accordance with 35 Ill. Adm. Code 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 Ill. Adm. Code 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 Ill. Adm. Code 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 of this permit.

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 Ill. Adm. Code 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 Ill. Adm. Code 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 Ill. Adm. Code 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 Ill. Adm. Code 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

5. Emissions Excursion Compensation

Pursuant to 35 Ill. Adm. Code 205.720, if the source fails to hold ATUs in accordance with Condition 3 of this Attachment, 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 Ill. Adm. Code 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. Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in 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 Ill. Adm. Code 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 Ill. Adm. Code 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 Ill. Adm. Code 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.
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 Ill. Adm. Code 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 Ill. Adm. Code 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 Ill. Adm. Code 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 Ill. Adm. Code 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 Ill. Adm. Code 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 Ill. Adm. Code 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 November 30 of each year, for the preceding seasonal allotment period.
8. Allotment of ATUs to the Source
- a.
 - i. The allotment of ATUs to this source is 266 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 21.0393 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 Ill. Adm. Code 205.405, including units complying with MACT or using BAT, as identified in Condition 10 of this Attachment 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 3(a) of this Attachment 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 Ill. Adm. Code Part 205, including:
 - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 Ill. Adm. Code 205.630;
 - ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 Ill. Adm. Code 205.720; and

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

9. Recordkeeping for ERMS

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

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as recorded and as required by Condition 6(g) of this permit and Condition 6(a) of this Attachment; and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

10. Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 Ill. Adm. Code 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 Ill. Adm. Code 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 Ill. Adm. Code 205.405(a) and (c)]:

Fuel Combustion Emission Units

- 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 Ill. Adm. Code 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 Ill. Adm. Code 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 Ill. Adm. Code 205.405(b) and (c)]:

None

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10.6 Attachment 6 - Non-Attainment NSR Applicability

Non-Attainment NSR Applicability

Contemporaneous Time Period of 1996 Through 2000

Table I - Emissions Increases Associated with the Proposed Modification

<u>Emission Unit</u>	<u>Proposed Commencement of Operation Date</u>	<u>VOM Emissions Increase (Tons/Year)</u>	<u>Permit Number</u>
Press #379	2000	9.70	00090061

Table II - Source-Wide Creditable Contemporaneous Emission Increases

<u>Emission Unit</u>	<u>Commencement of Operation Date</u>	<u>VOM Emissions Increase (Tons/Year)</u>	<u>Permit Number</u>
Press #356	1999	22.7	99070033
Press #357	1999		
Press #358	1997		

Table III - Source-Wide Creditable Contemporaneous Emission Decreases

<u>Emission Unit</u>	<u>Commencement of Operational Change Date</u>	<u>VOM Emissions Decrease (Tons/Year)</u>	<u>Permit Number</u>
Press #359 ^a	2000	7.50	N/A

Table IV - Net Emissions Change

	<u>(Tons/Year)</u>
Increases Associated with the Proposed Modification	9.70
Creditable Contemporaneous Emission Increases	22.70
Creditable Contemporaneous Emission Decreases	- 7.50
	<u>24.90</u>

^a This decrease is based on the actual emissions averaged from the two year period preceding the operational change. This includes calendar years 1998 and 1999. This press #359 will be shut down prior to operation of the new press #379.

10.8 Attachment 8 - Non-Attainment NSR Applicability

Nonattainment NSR Applicability

Contemporaneous Time Period of 1999 Through 2003

Table I - Emissions Increases Associated With The Proposed Modification

<u>Item of Equipment</u>	<u>Proposed Commencement of Operation Date</u>	<u>VOM Emissions Increase (Tons/Year)</u>	<u>Permit Number</u>
2 INDIGO Presses	2003	2.71	00090061

Table II - Source-Wide Creditable Contemporaneous Emission Increases

<u>Item of Equipment</u>	<u>Commencement of Operation Date</u>	<u>VOM Emissions Increase (Tons/Year)</u>	<u>Permit Number</u>
Press #356	1999		
#357	1999	17.99 ^a	99070033
#358	1997		
Press #379	2000	9.70	00090061
Press 6C DIEHLE	2000		
1C MIEHLE		1.56 ^b	00110007
VIDEOJET	2000	0.44 ^c	00110007

^a New Limit of VOM emissions. Presses were previously permitted for 22.7 tons/yr, but actual emissions have been less than 17.99 tons/yr.

^b New Limit of VOM emissions. Presses were previously permitted for 3.60 tons/yr, but actual emissions have been less than 17.99 tons/yr.

^c New Limit of VOM emissions. Presses were previously permitted for 0.75 tons/yr, but actual emissions have been less than 0.44 tons/yr.

Table III - Source-Wide Creditable Contemporaneous Emission Decreases

<u>Item of Equipment</u>	<u>Commencement of Operational Change Date</u>	<u>VOM Emissions Decrease (Tons/Year)</u>	<u>Permit Number</u>
Press #359 ^a	2000	7.50	N/A

^a This decrease is based on the actual emissions averaged from the two year period preceding the operational change. This includes calendar years 1998 and 1999. This press was shut down prior to operation of press #379.

Table IV - Net Emissions Change

	<u>(Tons/Year)</u>
Increases Associated With The Proposed Modification	2.71
Creditable Contemporaneous Emission Increases	29.69
Creditable Contemporaneous Emission Decreases	<u>- 7.50</u>
	24.90

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