FINAL DRAFT/PROPOSED CAAPP PERMIT
CFC International, Inc.
I.D. No.: 031045AGI
Application No.: 95120155
February 2, 2000

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

CFC International, Inc.
Attn: Mr. William Herring
500 State Street
Chicago Heights, Illinois 60411

Application No.: 95120155 I.D. No.: 031045AGI
Applicant's Designation: Date Received: December 11, 1995
Operation of: Coated Products Manufacturer
Date Issued: TO BE DETERMINED Expiration Date[2]: DATE
Source Location: 500 State Street, Chicago Heights, Cook County
Responsible Official: Mr. William Herring/Senior Vice President-Operations

This permit is hereby granted to the above-designated Permittee to operate a Coated Products Manufacturer Source, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Yeric Yarrington at 217/782-2113.

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

DES:YY:jar

cc: Illinois EPA, FOS, Region 1
USEPA

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

[2] Except as provided in Condition 8.7 of this permit.

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# 1.0 SOURCE IDENTIFICATION

## 1.1 Source

CFC International, Inc.
500 State Street
Chicago Heights, Illinois 60411
708/891-3456

I.D. No.: 031045AGI
Standard Industrial Classification: 2295, Coated Fabrics, Not Rubberized

## 1.2 Owner/Parent Company

CFC International, Inc.
500 State Street
Chicago Heights, Illinois 60411

## 1.3 Operator

CFC International, Inc.
500 State Street
Chicago Heights, Illinois 60411

Operator Contact Mr. William Herring
Contact Phone: 708/891-3456

## 1.4 General Source Description

CFC International, Inc. is located at 500 State Street in Chicago Heights, Illinois. The source is a coated products manufacturer, specifically, CFC produces hot stamp foils, including metallic foils in colors, bright and brushed tones, wood grain foils and pigmented foils. CFC also produces magnetic ink character recognition ribbons, multi-strike and computer printing film, correction lift-off tape and a line of products for the credit card and security industry. Mixing, blending and coating operations are used to produce these products. Primary emissions from the source are VOM and HAPs from the use of solvents and thinners.

## 2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

| | |
|---|---|
| Act | Illinois Environmental Protection Act [415 ILCS 5/1 et seq.] |
| ACMA | Alternative Compliance Market Account |
| AP-42 | Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711 |
| ATU | Allotment Trading Unit |
| BAT | Best Available Technology |
| Btu | British thermal unit |
| °C | Degrees Celsius |
| CAA | Clean Air Act [42 U.S.C. Section 7401 et seq.] |
| CAAPP | Clean Air Act Permit Program |
| CFR | Code of Federal Regulations |
| cm | Centimeter |
| $cm^2$ | Square centimeters |
| dscm | dry standard cubic feet |
| ERMS | Emission Reduction Marketing System |
| ERMS | Emissions Reduction Market System |
| °F | Degree Fahrenheit |
| ft/sec | Feet per second |
| $ft^2$ | Square feet |
| $ft^3$ | Cubic feet |
| gal | gallon |
| HAP | Hazardous Air Pollutant |
| hr | hour |
| I.D. No. | Identification Number of Source, assigned by Illinois EPA |
| IAC | Illinois Administrative Code |
| Illinois EPA | Illinois Environmental Protection Agency |
| in | inches |
| K | Kelvin |
| kg | kilogram |
| kg-mol | kilogram mole |
| kPa | Kilopascal |
| kW | kilowatts |
| l | liter |
| LAER | Lowest Achievable Emission Rate |
| lb | pound |
| lb-mole | pound mole |
| MACT | Maximum Achievable Control Technology |
| Mg | Megagram |
| mmBtu | Million British thermal units |
| mmscf | million standard cubic feet |

| | |
|---|---|
| mo | month |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| $NO_x$ | Nitrogen Oxides |
| NSPS | New Source Performance Standards |
| PM | Particulate Matter |
| $PM_{10}$ | Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods |
| ppm | parts per million |
| ppmv | parts per million volume |
| PSD | Prevention of Significant Deterioration |
| psi | Pounds per square inch |
| psia | Pounds per square inch area |
| °R | Degree Rankine |
| RMP | Risk Management Plan |
| SIP | State Implementation Plan |
| $SO_2$ | Sulfur Dioxide |
| T | ton |
| T1 | Title I – identifies Title I conditions that have been carried over from an existing permit |
| T1N | Title I New – identifies Title I conditions that are being established in this permit |
| T1R | Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit |
| USEPA | United States Environmental Protection Agency |
| VOC | Volatile Organic Compound |
| VOM | Volatile Organic Material |
| wt % | Weight percent |
| yr | year |

# 3.0 INSIGNIFICANT ACTIVITIES

## 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

### 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Storage Tanks 2, 6, 7, and 8
Wash Solvent Tank
Solvent Distillation and Recovery System
Dirty Solvent Tank
Hot Pot

### 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Storage Tanks 1, 3, 4, and 5
Drum Washer
Vat Washer
11-Web Slitters
Metallizer
3-Holographic Imagers
6-Air Compressors
2-R&D pilot coaters

### 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit’s process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1,

until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a)and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

## 4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

| Emission Unit | Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| 01 | Milling Operations (3-Ball and 3-Horizontal Mills), Mixing and Blending Operations (1-Mixing Tank and 7-Vat Stands), and Coating Mixing and Blending Operations (2-Kady Mills and 2-Sand Mills) | 3-Horizontal Mills-6/96<br><br>Other Units – 12/81 | Baghouse BH1 Controls 3-Ball and 3-Horizontal Mills, 1-Mixing Tank and 7-Vat Stands Dust Collector DC1 Controls 2 Kady Mills and 2-Sand Mills |
| 02 | Coating Units (12 Flexographic Presses CU1-CU12) and (3 Rotogravure Presses RG1, RG2, and RG3) | CU1-CU12 in 12/81, RG1-12/81, RG2-6/93, and RG3-2/97 | Oxidizer AFT1 |

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP(s) emissions.

### 5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

b. i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].

ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

c. 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 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 a. This stationary source, as defined in 40 CFR Part 63 Subpart KK, National Emission Standards for the Printing and Publishing Industry, is subject to 40 CFR Part 63. This stationary source shall comply and certify compliance with the applicable requirements of 40 CFR Part 63 Subpart KK, National Emission Standards for the Printing and Publishing Industry, as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

b. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

c. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts,

red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

## 5.3 Non-Applicability of Regulations of Concern

None

## 5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

## 5.5 Source-Wide Emission Limitations

### 5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

| Pollutant | Tons/Year |
|---|---|
| Volatile Organic Material (VOM) | 120.33 |
| Sulfur Dioxide ($SO_2$) | --- |
| Particulate Matter (PM) | 5.98 |
| Nitrogen Oxides ($NO_x$) | 17.32 |
| HAP, not included in VOM or PM | --- |
| TOTAL | 143.63 |

### 5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

### 5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

## 5.6 General Recordkeeping Requirements

### 5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

### 5.6.2 Records for Operating Scenarios

N/A

### 5.6.3 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

## 5.7 General Reporting Requirements

### 5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7 and Section 7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

# 6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

## 6.1 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 CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, 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 during initial issuance of the sources’ CAAPP 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 IAC 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 IAC 205.500 and 35 IAC 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 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a “participating source” for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, 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 6.5.

i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;

ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;

iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);

iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and

v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).

b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC 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 in Section 7.0 of this permit.

6.4 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 IAC 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 IAC 205.610(b).

c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 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 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, 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 IAC 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.

6.6 Quantification of Seasonal VOM Emissions

a. The methods and procedures specified in Sections 5 and 7 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 IAC 205.315(b)]:

No exceptions

b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 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 IAC 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.

6.7 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 IAC 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 IAC 205.337;

iv. If a source has experienced an emergency, as provided in 35 IAC 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 IAC 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 IAC 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 IAC 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.

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 155 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 15.8000 tons per season.

This determination includes the use of 1994 and 1996 as baseline seasons.

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 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 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 6.3(a) 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

Not applicable.

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 IAC Part 205, including:

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and

iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

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

a. Seasonal component of the Annual Emissions Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

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

None

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 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 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 IAC 205.405(b) and (c)]:

Flexographic and Rotogravure Presses

# 7.0 UNIT SPECIFIC CONDITIONS

## 7.1 Milling, Mixing, and Blending Operations

### 7.1.1 Description

01 – CFC International utilizes mills, vat stands, and a mixing tank to process solids and solvents to produce inks and coatings.

### 7.1.2 List of Emission Units and Pollution Control Equipment

| Emission Unit | Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| 01 | Milling Operations(3-Ball and 3- Horizontal Mills), Mixing and Blending Operations (1-Mixing Tank and 7-Vat Stands), and Coating Mixing and Blending Operations(2 Kady Mills and 2-Sand Mills) | 3-Horizontal Mill – 6/96<br><br>Other Units - 12/81 | Baghouse BH1 Controls 3-Ball and 3-Horizontal Mills, 1-Mixing Tank and 7-Vat Stands<br>Dust Collector DC1 Controls 2 Kady Mills and 2-Sand Mills |

### 7.1.3 Applicability Provisions and Applicable Regulations

a. The “affected paint manufacturing operations” for the purpose of these unit-specific conditions, are each operation as described in Condition 7.1.2.

b. The affected paint manufacturing operations are subject to 35 IAC 218, Subpart AA: Paint and Ink Manufacturing, because it has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate. These requirements are described in Condition 7.1.5.

c. The affected paint manufacturing operations are subject to 35 IAC Section 218.301, which provides that no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, with the following

exception: if no odor nuisance exists the limitation shall apply only to photochemically reactive material.

d. Affected paint manufacturing operations are subject to 35 IAC 212.321(a), which provides that:

i. 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, 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 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

7.1.4 Non-Applicability of Regulations of Concern

None

7.1.5 Operational and Production Limits and Work Practices

a. The Permittee shall follow good operating practices for the fabric filter dust collectors, including periodic inspection, routine maintenance and prompt repair of defects.

b. Pursuant to 35 IAC Part 218, Subpart AA, the Permittee shall comply with the following requirements, these requirements are also established in Construction Permit 96060039:

i. <u>Open-top mills, tanks, vats or vessels</u>

A. The mill, tank, vat or vessel is equipped with a cover which completely covers the mill, tank, vat or vessel opening except for an opening no larger than necessary to allow for safe clearance for a mixer shaft. Such cover shall extend at least 1.27 cm (0.5 in) beyond the outer rim of the opening or be attached to the rim.

B. The cover remains closed except when production, sampling, maintenance or inspection procedures require access.

C. The cover is maintained in good condition such that, when in place, it maintains contact with the rim of the opening for at least 90 percent of the circumference of the rim [35 IAC 218.624].

ii. Grinding mills

A. No person shall operate a grinding mill for the production of paint or ink which is not maintained in accordance with the manufacturer's specifications.

B. No person shall operate a grinding mill fabricated or modified after the effective date of this Subpart which is not equipped with fully enclosed screens.

C. The manufacturer's specifications shall be kept on file at the plant by the owner or operator of the grinding mill and be made available to any person upon verbal or written request during business hours [35 IAC 218.625].

iii. Storage Tanks

A. The owner or operator shall equip tanks storing VOL with a vapor pressure greater than 10 kPa (1.5 psi) at 20°C (68°F) with pressure/vacuum conservation vents set as a minimum at ±0.2 kPa (0.029 psi). These controls shall be operated at all times. An alternative air pollution control system may be used if it results in a greater emission reduction than these controls. Any alternative control system can be allowed only if approved by the Illinois EPA and approved by the USEPA as a SIP revision.

B. Stationary VOL storage containers with a capacity greater than 946 1 (250 gal) shall be equipped with a submerged-fill pipe or bottom fill. These controls shall be operated at all times. An alternative control system can be allowed only if approved by the Illinois EPA and approved by the USEPA as a SIP revision [35 IAC 218.626].

iv. Leaks

A. Each pump shall be checked by visual inspection each calendar week for indications of leaks, that is, liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, the pump shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.

B. Any pump, valve, pressure relief valve, sampling connection, open-ended valve and flange or connector containing a fluid which is at least 10 percent VOM by weight which appears to be leaking on the basis of sight, smell or sound shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.

C. A weather proof, readily visible tag, in bright colors such as red or yellow, bearing an identification number and the date on which the leak was detected shall be attached to leaking equipment. The tag may be removed upon repair, that is, when the equipment is adjusted or otherwise altered to allow operation without leaking.

D. When a leak is detected, the owner or operator shall record the date of detection and repair and the record shall be retained at the source for at least two years from the date of each detection or

each repair attempt. The record shall be made available to any person upon verbal or written request during business hours [35 IAC 218.628].

v. Clean Up

A. No person shall clean paint or ink manufacturing equipment with organic solvent unless the equipment being cleaned is completely covered or enclosed except for an opening no larger than necessary to allow safe clearance for proper operation of the cleaning equipment, considering the method and materials being used.

B. No person shall store organic wash solvent in other than closed containers, unless closed containers are demonstrated to be a safety hazard, or dispose of organic wash solvent in a manner such that more than 20 percent by weight is allowed to evaporate into the atmosphere [35 IAC 218.630].

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected paint manufacturing operations are subject to the following:

N/A

7.1.7 Testing Requirements

Upon request of the Illinois EPA or USEPA, the VOM emissions from an affected paint manufacturing operations shall be determined in accordance with Reference Method 25 specified in 40 CFR 60 Appendix A, pursuant to 35 IAC 218.105.

7.1.8 Monitoring Requirements

N/A

7.1.9 Recordkeeping Requirements

The Permittee shall maintain monthly and annual records of the following items for each affected paint manufacturing operation to demonstrate compliance with Conditions 5.5.1 and 7.1.3 of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Product solvent usage, ton/mo and ton/yr;

b. Clean-up solvent usage, ton/mo and ton/yr;

c. Operating hours of each affected paint manufacturing operation, hr/mo;

d. Total VOM emissions calculated based on the compliance procedures in Condition 7.1.12;

e. Solid material handled (e.g., pigment), ton/mo and ton/yr; and

f. Total PM emissions calculated based on the compliance procedures in Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. Notification within 30 days following the occurrence of a violation of the affected paint manufacturing line with the conditions of this section with a copy of such record for each incident.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits in Conditions 5.5.1 and 7.1.3 shall be based on the recordkeeping requirements in Condition 7.1.9 and the formulas listed below:

a. Compliance with Condition 7.1.3(d) is assumed to be achieved by proper operation of the fabric filter dust collectors, as addressed by Condition 7.1.5(a).

b. To determine compliance with Conditions 5.5.1 and 7.1.3(d), PM emissions from the affected paint manufacturing operations shall be calculated based on the following emission factors:

| Pollutant | Emission Factor (lb/Ton Pigment) |
|---|---|
| PM | 20 |

This is the uncontrolled emission factor for paint manufacturing, Table 6.4-1, AP-42, Volume I, Fifth Edition, January, 1995.

PM Emissions (lb) = (Pigment Usage, Ton) x (The Appropriate Emission Factor, lb/Ton) x [1 - Fabric Filter Dust Collector Efficiency* in %/100)]

*As specified by manufacturer or vendor of the fabric filter dust collectors

c. To determine compliance with Conditions 5.5.1 and 7.1.3(c), VOM emissions from representative recipes or compositions from each group of formulations of paint manufactured using the affected paint manufacturing operations shall be calculated as follows:

i. VOM emissions from the addition of materials to mixers, grinding equipment, and thin down tanks using Raoult’s Law and the Ideal Gas Law:

$$E_{VOM} = \Sigma(P_i^* \times V_i \times MW_i)/(R \times T)$$

Where:

$E_{VOM}$ = Total VOM loading emissions (lb/yr);

$P_i$ = Pure component vapor pressure of component i within the vessel headspace at temperature T (psia);

$V_i$ = Volume of vapor displaced, equal to total annual solvent i usage (gallons);

$MW_i$ = Vapor molecular weight of component i (lb/lb-mole);

R = Ideal gas constant (144.864 psia-gal/lb mol-K); and

T = Temperature (K).

ii. Heat-up losses that occur during the operation of high-speed dispersers, bead and ball mills, and similar types of dispersing equipment shall be calculated as follows, based on the Ideal Gas Law:

$$E_{VOM} = \Sigma\{[(P_i^*)_{T1}/Pa_1 + (P_i^*)_{T2}/Pa_2] \times [Pa_1/T1 - Pa_2/T2] \times V_i \times MW_i\}/2R$$

Where:

$E_{VOM}$ = VOM Emissions from material heat-up in the process equipment (lb/yr);

$(P_i^*)_{T1}$ = Vapor pressure of pure solvent i at initial temperature T1 (psia);

$(P_i^*)_{T2}$ = Vapor pressure of pure solvent i at final temperature T2 (psia);

$Pa_1$ = $14.696 - (P_i^*)_{T1}$;

$Pa_2$ = $14.696 - (P_i^*)_{T2}$;

T1 = Initial temperature (K);

T2 = Final temperature (K);

$V_i$ = Volume of annual solvent i usage (gallons);

$MW_i$ = Vapor molecular weight of component i (lb/lb-mole); and

R = Ideal gas constant (144.864 psia-gal/lb mol-K).

iii. Wash solvent emissions shall be calculated as follows:

$$E_{VOM} = 0.1 \times V \times \rho$$

Where:

$E_{VOM}$ = VOM Emissions of wash solvent (lb/yr);

V = Volume of annual wash solvent usage (gallons); and

$\rho$ = Average density of wash solvent (lb/gal).

iv. Total VOM emissions from the mixing and blending area are found by adding the emissions calculated in Conditions 7.1.12(c)(i) through (iii).

## 7.2 Unit 02 – Flexographic and Rotogravure Presses

### 7.2.1 Description

02 - Reverse roll, flexographic and rotogravure presses are used to apply water-based and solvent based inks and coatings on paper, foil, composite materials. The printing/coating is a continuous process performed on roll stock. Each press has a gas fired dryer to dry the inks and coatings. VOM and HAP(s) emissions result from the use of solvent based materials. Fuel combustion emissions results from the use of natural gas in the dryers.

### 7.2.2 List of Emission Units and Pollution Control Equipment

| Emission Unit | Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| 02 | Coating Units (12 Flexographic Presses CU1-CU12) and (3 Rotogravure Presses RG1, RG2, and RG3) | CU1-CU12 in 12/81, RG1 – 12/81, RG2 – 6/93, and RG3 – 2/97 | Oxidizer AFT1 |

### 7.2.3 Applicability Provisions and Applicable Regulations

a. An “affected printing line” for the purpose of these unit specific conditions is each press (CU1-CU12 and RG1-RG3) and associated dryer(s), used to perform printing/coating which falls under the category of product and packaging rotogravure or wide-web flexographic printing and is subject to 40 CFR 63 Subpart KK “National Emission Standards for the Printing and Publishing Industry”. As of the “date issued” as shown on page 1 of this permit, the affected printing lines are identified in Condition 7.2.2.

b. Each affected printing line is subject to 35 IAC 218.401(c)(2),(c)(4), (c)(5), and (c)(6), which provides that; no owner or operator of a subject printing line equipped with a capture system and control device shall operate the subject printing line unless:

i. An incineration system is used which reduces the captured VOM emissions by at least 90 percent by weight; and

ii. The printing line is equipped with a capture system and control device that provides an overall reduction in VOM emissions of at least:

A. 75 percent where a publication rotogravure printing line is employed, or

B. 65 percent where a packaging rotogravure printing line is employed, or

C. 60 percent where a flexographic printing line is employed; and

iii. The control device is equipped with the applicable monitoring equipment specified in 35 IAC Section 218.105(d)(2) except as provided in 35 IAC Section 218.105(d)(3), the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times the control device is in use; and

iv. The capture system and control device are operated at all times when the subject printing line is in operation. The owner or operator shall demonstrate compliance with this subsection by using the applicable capture system and control device test methods and procedures specified in 35 IAC Section 218.105(c) through Section 218.105(f) and by complying with the recordkeeping and reporting requirements specified in 35 IAC Section 218.404(e).

c. The affected printing lines are subject to 35 IAC 212.321(a), which provides that:

i. 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, 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 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

d. Each affected printing line is subject to the emission limits identified in Conditions 5.2.2 and 5.5.

7.2.4 Non-Applicability of Regulations of Concern

a. The affected printing lines are not subject to 35 IAC 218.204(c), Coating Operations - Paper Coating, as the paper coating limitation does not apply to a line on which printing is performed which complies with the emission limitations in 35 IAC 218.401 [35 IAC 218.204(c)].

b. This permit is issued based on the affected printing presses not being subject to 40 CFR 60, Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing, because the affected printing presses are not used to coat flexible vinyl or urethane products which excludes flexible packaging.

c. This permit is issued based on the affected printing presses not being subject to 40 CFR 60, Subpart SSS - Standards of Performance for Magnetic Tape Coating and Printing, because the affected printing presses used to produce magnetic tape products were not constructed, modified, or reconstructed after January 22, 1986.

d. This permit is issued based on the affected printing presses not being subject to 40 CFR 60, Subpart QQ - Standards of Performance for the Graphics Art Industry: Publication Rotogravure Printing, because the affected printing presses that are rotogravure units are not used as publication rotogravure printing presses, specifically the units do not produce the products listed as products produced by a publication rotogravure printing press, as defined in 40 CFR 60.431 - Definitions and notations.

e. The affected printing lines are not subject to 35 IAC 218 Subpart G, as the subpart does not apply to a line which complies with 35 IAC 218 Subpart H [35 IAC 218.402(b)].

7.2.5 Operation and Control Requirements

a. Pursuant to 35 IAC 218.401(c)(5), the control device shall be equipped with the applicable monitoring equipment, calibrated, operated and maintained according to vendor specifications at all times the control device is in use.

b. Pursuant to 35 IAC 218.401(c)(6), the capture system and control device are operated at all times when an affected printing line is in operation.

c. Natural gas shall be the only fuel fired in the press dryer(s) of each affected printing line.

d. Not withstanding 35 IAC 218.107, seasonal shutdown of the oxidizers is not permitted. The above limitations were established in Construction Permit 96120080 pursuant to 35 IAC Part 203. These limits ensure that the construction/modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 IAC Part 203. [T1]

e. The capture system for each affected printing line shall be maintained and operated to meet a Permanent Total Enclosure (PTE) with a 100% capture efficiency, as defined by 35 IAC 218, Appendix B, Procedure T, and a 98% overall VOM destruction efficiency, as specified in Construction Permits 93050027 and 96110078 and Operating Permit 81120064. [T1]

f. This permit is issued based on the affected printing presses constructed, modified, or reconstructed after January 22, 1986 not being used to produce magnetic tape products, specifically affected printing presses RG2 and RG3 shall not be used to produce or process portion of magnetic tape products.

g. This permit is issued based on the affected printing presses not being used as publication rotogravure printing presses, specifically the units shall not produce the products listed as products produced by a publication rotogravure printing press, as defined in 40 CFR 60.431 - Definitions and notations.

h. Each product and packaging rotogravure or wide-web flexographic printing affected source shall limit emissions to no more than five percent of the organic HAP applied for the month. The owner or operator of each product and packaging rotogravure or wide-web flexographic printing affected source shall demonstrate compliance with this standard by following the procedures below: [40 CFR 63.825(b)]

i. Operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95 percent for each month. The owner or operator shall demonstrate compliance in accordance with the procedure in Condition 7.2.5(h)(ii) when emissions are controlled by an oxidizer. [40 CFR 63.825(b)(7)]

ii. To demonstrate compliance with the overall organic HAP control efficiency requirement in Condition 7.2.5(h)(i), each owner or operator using an oxidizer to control emissions shall show compliance by demonstrating initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in Conditions 7.2.5(h)(ii)(A) through (E): [40 CFR 63.825(d) and (d)(1)]

A. Determine the oxidizer destruction efficiency (E) using the procedure in Condition 7.2.7(a).

B. Determine the capture system capture efficiency (F) in accordance with Conditions 7.2.7(b)-(c).

C. Calculate the overall organic HAP control efficiency, (R), achieved using the following equation:

$$R = E \times F/100$$

Where:

E = Organic volatile matter control efficiency of the control device (percent)

F = Organic volatile matter capture efficiency of the capture system (percent)

D. Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameters established in accordance with Condition 7.2.8(b)-(c) whenever a product and packaging rotogravure or wide-web flexographic press is operating.

E. The affected source is in compliance, if the oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in accordance with Condition 7.2.8(b) for each three-hour period, and the capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value established in accordance with Condition 7.2.8(c) for each three hour period, and the overall organic HAP control efficiency, R, is 95 percent or greater.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected printing lines are subject to the following:

VOM material usage and the emissions of VOM shall not exceed the following limits:

| Affected Printing Line | VOM Usage (ton/mo) | VOM Usage (ton/yr) | VOM Emissions (ton/mo) | VOM Emissions (ton/yr) |
|---|---|---|---|---|
| CU1-CU12 | 357.4 | 4,208.1 | 7.15 | 84.18 |
| RG1 | 17.1 | 201.04 | 0.33 | 3.94 |
| RG2 | 24.4 | 287.33 | 0.49 | 5.75 |
| RG3 | 65.8 | 775.3 | 1.32 | 15.51 |

These limits are based upon the maximum VOM usage, the overall control efficiency required per unit in condition 7.2.5, and the maximum year round operating hours of 8,760 hr/yr per unit.

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 (running 12 month total) [T1R].

The above limitations contain revisions to previously issued Permits 81120064, 91040062, 93050027, 96060039, and 96110078. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of these aforementioned permits, 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 CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). 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 construction permits do not represent the current operating configuration of the source, that is equipment changes have taken place (i.e., construction permit limitation applied to 14 units and now 2 units have been removed). [T1R]

7.2.7 Testing Requirements

a. A performance test of a control device to determine destruction efficiency for the purpose of meeting the requirements of Condition 7.2.5(h) shall be conducted by the owner or operator in accordance with the following: [40 CFR 63.827(d)]

i. An initial performance test to establish the destruction efficiency of an oxidizer and the associated catalyst bed inlet temperature for a catalytic oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:

A. Method 1 or 1A of 40 CFR part 60, appendix A is used for sample and velocity traverses to determine sampling locations.

B. Method 2, 2A, 2C, or 2D of 40 CFR part 60, appendix A is used to determine gas volumetric flow rate.

C. Method 3 of 40 CFR part 60, appendix A is used for gas analysis to determine dry molecular weight.

D. Method 4 of 40 CFR part 60, appendix A is used to determine stack gas moisture.

E. Methods 2, 2A, 3, and 4 of 40 CFR part 60, appendix A shall be performed, as applicable, at least twice during each test period.

F. Method 25 of 40 CFR part 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in Conditions 7.2.7(a)(i)(F)(1)-(3). The owner or operator shall submit notice of the intended test method to the Administrator for approval along with notice of the performance test required under 40 CFR 63.7(c). The owner or operator may use Method 25A of 40 CFR part 60, appendix A, if

1. An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with the standards of Condition 7.2.5(h), or

2. The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less, or

3. Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

G. Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.

H. Organic volatile matter mass flow rates shall be determined using the following equation:

$$M_f = Q_{sd}[\Sigma C_i MW_i][0.0416][10^{-6}]$$

Where:

$Q_{sd}$ = Volumetric flow rate of gases entering or exiting the control device, as determined by Method 2 (dscm/hr)

$C_i$ = Organic volatile matter concentration in ppm, dry

basis, of compound i in the vent gas, as determined by Method 25 or 25A

$MW_i$ = Molecular weight of compound i in the vent gas (kg/kg-mol)

I. Emission control device efficiency shall be determined using the following equation:

$$E = (M_{fi}-M_{fo})/M_{fi}$$

Where:

$M_{fi}$ = Organic volatile matter mass flow rate at the inlet to the control device (kg/hr)

$M_{fo}$ = Organic volatile matter mass flow rate at the outlet of the control device (kg/hr)

ii. The owner or operator shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

iii. For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For a catalytic oxidizer, the owner or operator shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. This minimum temperature is the operating parameter value that demonstrates continuing compliance with the requirements of Condition 7.2.5(h).

b. A performance test to determine the capture efficiency of each capture system venting organic emissions to a

control device for the purpose of meeting the requirements of Condition 7.2.5(h) shall be conducted by the owner or operator in accordance with the following: [40 CFR 63.827(e)]

For permanent total enclosures, capture efficiency shall be assumed as 100 percent. Procedure T—Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in appendix B to 40 CFR 52.741 shall be used to confirm that an enclosure meets the requirements for permanent total enclosure.

c. As an alternative to the procedures specified in Condition 7.2.7(b) an owner or operator required to conduct a capture efficiency test may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective (DQO) or the Lower Confidence Limit (LCL) approach as described in Appendix A of 40 CFR 63 Subpart KK. [40 CFR 63.827(f)]

7.2.8 Monitoring Requirements

a. The oxidizer, AFT1, shall use a Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained and operated according to vendor specifications at all times the oxidizer is in use. The continuous monitoring temperature rise across each catalytic afterburner bed or the VOM concentration of the exhaust of the oxidizer shall be monitored, as specified in 35 IAC 218.105(d)(2)(ii) [35 IAC 218.401(c)(5)].

b. An owner or operator complying with the requirements of Condition 7.2.5(h) through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter shall: [40 CFR 63.828(a)(4)]

For a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ±1 percent of the temperature being monitored in °C or ±1

°C, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

c. An owner or operator complying with the requirements of Condition 7.2.5(h) through the use of a control device and demonstrating continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, shall: [40 CFR 63.828(a)(5)]

i. Submit to the Administrator with the compliance status report required by 40 CFR 63.9(h), a plan that

A. Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained,

B. Discusses why this parameter is appropriate for demonstrating ongoing compliance, and

C. Identifies the specific monitoring procedures;

ii. Set the operating parameter value, or range of values, that demonstrate compliance with Condition 7.2.5(h), and

iii. Conduct monitoring in accordance with the plan submitted to the Administrator unless comments received from the Administrator require an alternate monitoring scheme.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected printing line to demonstrate compliance with Conditions 5.5 and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

a. Each affected printing line is subject to recordkeeping requirements of 35 IAC 218.404(e)(2), which provides that:

   i. The owner or operator of a printing line subject to the limitations of 35 IAC Section 218.401 and complying by means of 35 IAC Section 218.401(c) shall collect and record all of the following information each day for each printing line and maintain the information at the source:

      A. Control device monitoring data.

      B. A log of operating time for the capture system, control device, monitoring equipment and the associated printing line.

      C. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

b. The owner or operator of an affected printing line shall collect and record all of the following information for each printing line and maintain the information at the source:

   i. The name and identification number of each VOM containing material used.

   ii. The VOM content (wt %) of each VOM containing material used.

   iii. Usage of each VOM containing material (lb/mo).

   iv. The actual overall VOM control efficiency of the device(s) controlling each line. (% VOM controlled). The actual overall VOM control efficiency shall be determined based on the most recent Illinois EPA approved stack test data.

v. Operating hours of each affected printing line. (hr/mo)

vi. VOM emissions from affected printing lines CU1-CU12 calculated in accordance with the procedures given in Condition 7.2.12 (lb/hr and ton/yr).

vii. VOM emissions from each affected printing line RG1, RG2, and RG3 calculated in accordance with the procedures given in Condition 7.2.12 (lb/hr and ton/yr).

c. The owner or operator of an affected printing line shall collect and record all of the following information for the printing line dryers and control devices and maintain the information at the source:

i. Fuel usage (mmscf/yr).

ii. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.2.12 (ton/yr).

7.2.10 Reporting Requirements

a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected printing line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

b. Each affected printing line is subject to reporting requirements of 35 IAC 218.404(e)(3), which provides that:

i. The owner or operator of a subject printing line shall notify the Illinois EPA in the following instances:

A. Any record showing violation of 35 IAC Section 218.401(c), shall be reported by sending a copy of such record to the

Illinois EPA within 30 days following the occurrence of the violation.

B. At least 30 calendar days before changing the method of compliance with 35 IAC Section 218.401 from 35 IAC Section 218.401(c) to 35 IAC Section 218.401(a) or (b), the owner or operator shall comply with all requirements of 35 IAC 218.404 (c)(1) or (d)(1), respectively. Upon changing the method of compliance with 35 IAC Section 218.401 from 35 IAC Section 218.401(c) to 35 IAC Section 218.401(a) or (b), the owner or operator shall comply with all requirements of 35 IAC 218.404(c) or (d), respectively.

C. Any record showing violation of the operating and control requirements of condition 7.2.5 and emission limitations of condition 7.2.6, shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.

c. The Permittee of an affected source subject to 40 CFR 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry, shall submit the following reports:

i. Initial notifications for existing sources no later than one year before the compliance date of May 30, 1999, as required by 63.9(b), pursuant to 40 CFR 63.830(b)(I).

ii. Initial notifications for new and reconstructed sources shall be submitted as required by 40 CFR 63.9(b), pursuant to 40 CFR 63.830(b)(ii).

iii. A Title V or part 70 permit application, submitted by the same due dates as those specified for the initial notifications, may be used in lieu of the initial notification required under 40 CFR 63.9(b), provided the same information is contained in the permit

application as required by 40 CFR 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of 40 CFR 63 and has received delegation of authority from the USEPA, pursuant to 40 CFR 63.930(b)(iii) and (iv).

iv. Notification of Performance Tests specified in 40 CFR 63.7 and 63.9(e), pursuant to 40 CFR 63.830(b)(2).

v. Notification of Compliance Status specified in 40 CFR 63.9(h), pursuant to 40 CFR 63.830(b)(3).

vi. Performance test reports specified in 40 CFR 63.10(d)(2), pursuant to 40 CFR 63.830(b)(4).

vii. Pursuant to 40 CFR 63.830(6), a summary report specified in 40 CFR 63.10(e)(3) shall be submitted on a semi-annual basis. In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(I), the summary report shall include, as applicable:

A. Exceedances of the standards in 40 CFR 63.824-63.825;

B. Exceedances of either of the criteria of 40 CFR 63.820(a)(2);

C. Exceedances of the criteria of 40 CFR 63.821(b)(1) and the criterion of 40 CFR 63.821(b)(2) in the same month; and

D. Exceedances of the criterion of 40 CFR 63.821(a)(2)(ii)(A).

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

a. Compliance with Condition 7.2.3(b) shall be determined based upon testing required by Condition 7.2.7.

b. Compliance with Condition 7.2.3(c) is assumed to be inherent in operation of the printing lines, so that no compliance procedures are set in this permit addressing these regulations.

c. i. Compliance with Conditions 5.5 and 7.2.6 for each affected printing line or a group of printing lines (i.e., CU1-CU12) shall be determined based upon the recordkeeping requirements of Condition 7.2.9 and the formula(s) given below:

$$E_v = \sum_{i=1}^{n} C_i W_i \left(1 - D_v\right)$$

Where:

v = Printing Line Identification

n = The total number of VOM containing materials applied on line v

$E_v$ = Total VOM emissions from line v

$C_i$ = Quantity of VOM containing material used on line v each month (lb/mo)

$W_i$ = VOM content of VOM containing material applied on line v each month (wt. % VOM)

$D_v$ = Actual overall control efficiency of the device(s) controlling line v

ii. Compliance with the hourly limit as defined in Condition 7.2.6 shall be determined by dividing the monthly individual unit VOM emission or monthly group emissions by the individual unit or group operating hour.

iii. Compliance with the annual limits shall be determined on a monthly basis from the sum of

the data for the current month plus the preceding 11 months.

d. Compliance with Condition 5.5 for the affected printing line dryers and control devices fuel combustion emissions shall be based on the recordkeeping requirements in Condition 7.2.9 and the emissions factors and formulas listed below:

Table 1. For natural gas fired units with firing rate of less than 100 mmBtu/hr.

| Pollutant Type | Emission Factor (lb/mmscf) |
|---|---|
| $NO_x$ | 100 |
| VOM | 5.5 |
| PM | 7.6 |
| $SO_2$ | 0.6 |

Emission factors are based on the maximum firing rate of an individual units and Tables 1.4-1, and 1.4-2, AP-42, Fifth Edition, Volume 1, Supplement D, March 1998.

Emission (ton) = Natural Gas Usage (mmscf) x The Applicable Emission Factor (lb/mmscf) x Conversion Factor (ton/2000 lb)

# 8.0 GENERAL PERMIT CONDITIONS

## 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____**{insert public notice start date}** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

## 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

## 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

## 8.4 Operational Flexibility/Anticipated Operating Scenarios

### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

a. Describe the physical or operational change;

b. Identify the schedule for implementing the physical or operational change;

c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

| Monitoring Period | Report Due Date |
|---|---|
| January - June | September 1 |
| July - December | March 1 |

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company’s representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

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

iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 (“Title I provisions”) and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I

provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

# 9.0 STANDARD PERMIT CONDITIONS

## 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

## 9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or

denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

## 9.5 Liability

### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

### 9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

### 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

### 9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

## 9.6 Recordkeeping

### 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance

was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

# 10.0 ATTACHMENTS

## 10.1 Attachment 1: Emissions of Particulate Matter from New Process Emission Units

### 10.1.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

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, 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 IAC 212.321 [35 IAC 212.321(a)].

b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

Where:

P = Process weight rate; and
E = Allowable emission rate; and,

i. Up to process weight rates of 408 Mg/hr (450 T/hr):

| | Metric | English |
|---|---|---|
| P | Mg/hr | T/hr |
| E | kg/hr | lb/hr |
| A | 1.214 | 2.54 |
| B | 0.534 | 0.534 |

ii. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

| | Metric | English |
|---|---|---|
| P | Mg/hr | T/hr |
| E | kg/hr | lb/hr |
| A | 11.42 | 24.8 |
| B | 0.16 | 0.16 |

c. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

| Metric | | English | |
|---|---|---|---|
| P | E | P | E |
| Mg/hr | kg/hr | T/hr | lb/hr |
| 0.05 | 0.25 | 0.05 | 0.55 |
| 0.1 | 0.29 | 0.10 | 0.77 |
| 0.2 | 0.42 | 0.2 | 1.10 |
| 0.3 | 0.64 | 0.30 | 1.35 |
| 0.4 | 0.74 | 0.40 | 1.58 |
| 0.5 | 0.84 | 0.50 | 1.75 |
| 0.7 | 1.00 | 0.75 | 2.40 |
| 0.9 | 1.15 | 1.00 | 2.60 |
| 1.8 | 1.66 | 2.00 | 3.70 |
| 2.7 | 2.1 | 3.00 | 4.60 |
| 3.6 | 2.4 | 4.00 | 5.35 |
| 4.5 | 2.7 | 5.00 | 6.00 |
| 9.0 | 3.9 | 10.00 | 8.70 |
| 13.0 | 4.8 | 15.00 | 10.80 |
| 18.0 | 5.7 | 20.00 | 12.50 |
| 23.0 | 6.5 | 25.00 | 14.00 |
| 27.0 | 7.1 | 30.00 | 15.60 |
| 32.0 | 7.7 | 35.00 | 17.00 |
| 36.0 | 8.2 | 40.00 | 18.20 |
| 41.0 | 8.8 | 45.00 | 19.20 |
| 45.0 | 9.3 | 50.00 | 20.50 |
| 90.0 | 13.4 | 100.00 | 29.50 |
| 140.0 | 17.0 | 150.00 | 37.00 |
| 180.0 | 19.4 | 200.00 | 43.00 |
| 230.0 | 22.0 | 250.00 | 48.50 |
| 270.0 | 24.0 | 300.00 | 53.00 |
| 320.0 | 26.0 | 350.00 | 58.00 |
| 360.0 | 28.0 | 400.00 | 62.00 |
| 408.0 | 30.1 | 450.00 | 66.00 |
| 454.0 | 30.4 | 500.00 | 67.00 |

## 10.2 Attachment 2: Emissions of Particulate Matter from Existing Process Emission Units

### 10.2.1 Process Emission Units for Which Construction or Modification Commenced Prior to After April 14, 1972

a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

$$E = C + A(P)^B$$

Where:

P = Process weight rate; and
E = Allowable emission rate; and,

i. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

| | Metric | English |
|---|---|---|
| P | Mg/hr | T/hr |
| E | kg/hr | lb/hr |
| A | 1.985 | 4.10 |
| B | 0.67 | 0.67 |
| C | 0 | 0 |

ii. For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

| | Metric | English |
|---|---|---|
| P | Mg/hr | T/hr |
| E | kg/hr | lb/hr |
| A | 25.21 | 55.0 |
| B | 0.11 | 0.11 |
| C | -18.4 | -40.0 |

c. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

| Metric | | English | |
|---|---|---|---|
| P | E | P | E |
| Mg/hr | kg/hr | T/hr | lb/hr |
| 0.05 | 0.27 | 0.05 | 0.55 |
| 0.1 | 0.42 | 0.10 | 0.87 |
| 0.2 | 0.68 | 0.2 | 1.40 |
| 0.3 | 0.89 | 0.30 | 1.83 |
| 0.4 | 1.07 | 0.40 | 2.22 |
| 0.5 | 1.25 | 0.50 | 2.58 |
| 0.7 | 1.56 | 0.75 | 3.38 |
| 0.9 | 1.85 | 1.00 | 4.10 |
| 1.8 | 2.9 | 2.00 | 6.52 |
| 2.7 | 3.9 | 3.00 | 8.56 |
| 3.6 | 4.7 | 4.00 | 10.40 |
| 4.5 | 5.4 | 5.00 | 12.00 |
| 9.0 | 8.7 | 10.00 | 19.20 |
| 13.0 | 11.1 | 15.00 | 25.20 |
| 18.0 | 13.8 | 20.00 | 30.50 |
| 23.0 | 16.2 | 25.00 | 35.40 |
| 27.2 | 18.15 | 30.00 | 40.00 |
| 32.0 | 18.8 | 35.00 | 41.30 |
| 36.0 | 19.3 | 40.00 | 42.50 |
| 41.0 | 19.8 | 45.00 | 43.60 |
| 45.0 | 20.2 | 50.00 | 44.60 |
| 90.0 | 23.2 | 100.00 | 51.20 |
| 140.0 | 25.3 | 150.00 | 55.40 |
| 180.0 | 26.5 | 200.00 | 58.60 |
| 230.0 | 27.7 | 250.00 | 61.00 |
| 270.0 | 28.5 | 300.00 | 63.10 |
| 320.0 | 29.4 | 350.00 | 64.90 |
| 360.0 | 30.0 | 400.00 | 66.20 |
| 400.0 | 30.6 | 450.00 | 67.70 |
| 454.0 | 31.3 | 500.00 | 69.00 |

10.3 Attachment 3: Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

YY:jar

## I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

CFC International, Inc. is located at 500 State Street in Chicago Heights, Illinois. The source is a coated products manufacturer, specifically, CFC produces hot stamp foils, including metallic foils in colors, bright and brushed tones, wood grain foils and pigmented foils. CFC also produces magnetic ink character recognition ribbons, multi-strike and computer printing film, correction lift-off tape and a line of products for the credit card and security industry. Mixing, blending and coating operations are used to produce these products. Primary emissions from the source are VOM and HAPs from the use of solvents and thinners.

## II. EMISSION UNITS

Significant emission units at this source are as follows:

| Emission Unit | Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| 01 | Milling Operations (3-Ball and 3-Horizontal Mills), Mixing and Blending Operations (1-Mixing Tank and 7-Vat Stands), and Coating Mixing and Blending Operations (2-Kady Mills and 2-Sand Mills) | 3-Horizontal Mills-6/96<br><br>Other Units – 12/81 | Baghouse BH1 Controls 3-Ball and 3-Horizontal Mills, 1-Mixing Tank and 7-Vat Stands<br>Dust Collector DC1 Controls 2 Kady Mills and 2-Sand Mills |
| 02 | Coating Units (12 Flexographic Presses CU1-CU12) and (3 Rotogravure Presses RG1, RG2, and RG3) | CU1-CU12 in 12/81, RG1-12/81, RG2-6/93, and RG3-2/97 | Oxidizer AFT1 |

## III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

| Pollutant | Tons/Year |
|---|---|
| Volatile Organic Material (VOM) | 120.33 |
| Sulfur Dioxide ($SO_2$) | --- |
| Particulate Matter (PM) | 5.98 |
| Nitrogen Oxides ($NO_x$) | 17.32 |
| HAP, not included in VOM or PM | --- |
| TOTAL | 143.63 |

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

## IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board’s emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

## V. PROPOSED PERMIT

### CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance

with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

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