

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NESHAP SOURCE -- REVISED

PERMITTEE

Videojet Technologies, Inc.  
Attn: Peter Papantos  
1855 Estes Avenue  
Elk Grove Village, Illinois 60007-5413

<u>Application No.:</u> 02040087	<u>I.D. No.:</u> 031440AIW
<u>Applicant's Designation:</u>	<u>Date Received:</u> December 13, 2013
<u>Subject:</u> Ink Production and Packaging	
<u>Date Issued:</u> March 5, 2014	<u>Expiration Date:</u> February 15, 2017
<u>Location:</u> 1855 Estes Avenue, Elk Grove Village, Cook County, 60007-5413	

This Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of five (5) mixing tanks (250 gallons or greater), thirty one (31) mixing tanks (250 gallons or less), one (1) solvent-based ink/solutions packaging line, one (1) water-based product packaging line, one (1) automated bottle fill line, one (1) manual bottle filling station/line, a dust collector controlling all pigment additions associated with water and solvent-based ink mixing, one (1) 10,450 gallon underground methanol storage tank and one (1) 10,450 gallon underground methyl ethyl ketone storage tank as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
  - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM) and 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
  - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing, 40 CFR 63 Subpart HHHHH.
  - iii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.

- b. Prior to initial issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Paints and Allied Products Manufacturing, 40 CFR 63 Subparts A and CCCCCC. The Illinois EPA is administering the NESHAP in Illinois on behalf of the USEPA under a delegation agreement. Pursuant to 40 CFR 63.11599(a), you are subject to 40 CFR 63 Subpart CCCCCC if you own or operate a facility that performs paints and allied products manufacturing that is an area source of hazardous air pollutant (HAP) emissions and processes, uses, or generates materials containing HAP, as defined in 40 CFR 63.11607.
  - b. Pursuant to 40 CFR 63.11600(a), if you own or operate an existing affected source, you must achieve compliance with the applicable provisions in 40 CFR 63 Subpart CCCCCC by December 3, 2012.
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
  - b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
  - c. Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith at a point beyond the property line of the source.
  - d. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).

- 4a. Pursuant to 35 Ill. Adm. Code 218.122(a), no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having through-put of greater than 151 cubic meters per day (40,000 gallons/day) into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions and is approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code Part 201, and further processed consistent with 35 Ill. Adm. Code 218.108.
- b. Pursuant to 35 Ill. Adm. Code 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liters (250 gallons), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code Part 201, and further processed consistent with 35 Ill. Adm. Code 218.108, or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 218.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 218.121(b)(2).
- c. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall only apply to photochemically reactive material.
- d. This source is subject to 35 Ill. Adm. Code Part 218 Subpart AA (Paint and Ink Manufacturing). Pursuant to 35 Ill. Adm. Code 218.620(b), 35 Ill. Adm. Code 218 Subpart AA shall also apply all paint and ink manufacturing sources which:
  - i. Have the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate, from process emission units that:
    - A. Are not regulated by 35 Ill. Adm. Code 218 Subparts B, E, F, H, Q, R, S, T (excluding 35 Ill. Adm. Code 218.486), V, X, Y, Z, or BB, or
    - B. Are not included in any of the following categories:  
synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, wood furniture, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations, or
  - ii. Produce more than 1,892,705 liters (500,000 gallons) per calendar year of paint or ink formulations which contain less than 10% (by

weight) water, and ink formulations not containing as the primary solvents water, Magie oil or glycol.

5. This permit is issued based on the two 10,450 gallon underground storage tanks not being subject to the New Source Performance Standard (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60 Subpart Kb because the capacity of each tank is less than 75 cubic meters (m<sup>3</sup>).
6. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing, 40 CFR 63 Subpart HHHHH. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
7. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- 8a. This permit is issued based on the two 10,450 gallon underground storage tanks not being subject to 35 Ill. Adm. Code 218.120 (Control Requirements for Storage Containers of VOL). Pursuant to 35 Ill. Adm. Code 218.119, the limitations of 35 Ill. Adm. Code 218.120 shall apply to all storage containers of volatile organic liquid (VOL) with a maximum true vapor pressure of 0.5 psia or greater in any stationary tank, reservoir, or other container of 151 cubic meters (40,000 gal) capacity or greater.
- b. Pursuant to 35 Ill. Adm. Code 218.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.122 shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).
- c. This permit is issued based on the cleaning operations at this source not being subject to 35 Ill. Adm. Code 218.187 (Other Industrial Solvent Cleaning Operations). Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after April 1, 2011 except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations which use organic materials at sources that emit a total of 6.8 kg/day (15 lbs/day) or more of VOM from cleaning operations at the source, in the absence of air pollution control equipment. For purposes of 35 Ill. Adm. Code 218.187,

"cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;

- d. Pursuant to 35 Ill. Adm. Code 218.621, the requirements of 35 Ill. Adm. Code 218.624 and 218.625 and 35 Ill. Adm. Code 218.628(a) shall not apply to equipment while it is being used to produce either:
  - i. Paint or ink formulations which contain 10 percent or more (by weight) water, or
  - ii. Inks containing Magie oil and glycol as the primary solvent.
- e. This permit is issued based upon the operations of this source not being subject to the requirements of VOM control in 35 Ill. Adm. Code 218, Subpart QQ (Miscellaneous Formulation Manufacturing Process). This is a result of the conditions in this permit which constrain maximum theoretical emissions to less than 100 tons per year VOM and potential to emit to less than 25 tons per year.
- 9a. Pursuant to 40 CFR 63.11601(a), for each new and existing affected source, you must comply with the requirements in 40 CFR 63.11601(a)(1) through (5). These requirements apply at all times.
  - i. You must add the dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel and operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process.
  - ii. You must capture particulate emissions and route them to a particulate control device meeting the requirements of 40 CFR 63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel. This requirement does not apply to pigments and other solids that are in paste, slurry, or liquid form.
  - iii. You must:
    - A. Capture particulate emissions and route them to a particulate control device meeting the requirements of 40 CFR 63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process; or
    - B. Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process only in paste, slurry, or liquid form.

- iv. You must:
  - A. Capture particulate emissions and route them to a particulate control device meeting the requirements of 40 CFR 63.11601(a)(5) during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or
  - B. Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or
  - C. Ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel.
- v. The visible emissions from the particulate control device exhaust must not exceed 10-percent opacity for particulate control devices that vent to the atmosphere. This requirement does not apply to particulate control devices that do not vent to the atmosphere.
- b. Pursuant to 40 CFR 63.11601(b), For each new and existing affected source, you must comply with the requirements in 40 CFR 63.11601(b)(1) through (5).
  - i. Process and storage vessels that store or process materials containing benzene or methylene chloride, except for process vessels which are mixing vessels, must be equipped with covers or lids meeting the requirements of 40 CFR 63.11601(b)(1)(i) through (iii).
    - A. The covers or lids can be of solid or flexible construction, provided they do not warp or move around during the manufacturing process.
    - B. The covers or lids must maintain contact along at least 90-percent of the vessel rim. The 90-percent contact requirement is calculated by subtracting the length of any visible gaps from the circumference of the process vessel, and dividing this number by the circumference of the process vessel. The resulting ratio must not exceed 90-percent.
    - C. The covers or lids must be maintained in good condition.
  - ii. Mixing vessels that store or process materials containing benzene or methylene chloride must be equipped with covers that completely cover the vessel, except as necessary to allow for safe clearance of the mixer shaft.

- iii. All vessels that store or process materials containing benzene or methylene chloride must be kept covered at all times, except for quality control testing and product sampling, addition of materials, material removal, or when the vessel is empty. The vessel is empty if:
  - A. All materials containing benzene or methylene chloride have been removed that can be removed using the practices commonly employed to remove materials from that type of vessel, e.g., pouring, pumping, and aspirating; and
  - B. No more than 2.5 centimeters (one inch) depth of residue remains on the bottom of the vessel, or no more than 3 percent by weight of the total capacity of the vessel remains in the vessel.
- iv. Leaks and spills of materials containing benzene or methylene chloride must be minimized and cleaned up as soon as practical, but no longer than 1 hour from the time of detection.
- v. Rags or other materials that use a solvent containing benzene or methylene chloride for cleaning must be kept in a closed container. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- c. Pursuant to 40 CFR 63.11605, Table 1 of 40 CFR 63 Subpart CCCCCC (see Attachment B) shows which parts of the General Provisions in 40 CFR 63.1 through 63.16 apply to you.
- 10a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property 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 required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
  - i. The name and address of the source;

- ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- 11a. Pursuant to 35 Ill. Adm. Code 218.624, no person shall operate an open-top mill, tank, vat or vessel, with a volume of more than 45 liters (12 gallons) for the production of paint unless:
- i. 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.
  - ii. The cover remains closed except when production, sampling, maintenance or inspection procedures require access.
  - iii. 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.
- b. Pursuant to 35 Ill. Adm. Code 218.625(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.

- c. Pursuant to 35 Ill. Adm. Code 218.625(b), no person shall operate a grinding mill fabricated or modified after the effective date of 35 Ill. Adm. Code 218 Subpart AA which is not equipped with fully enclosed screens.
- d. Pursuant to 35 Ill. Adm. Code 218.626(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.
- e. Pursuant to 35 Ill. Adm. Code 218.626(b), stationary VOL storage containers with a capacity greater than 946 liters (250 gallons) 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.
- f. Pursuant to 35 Ill. Adm. Code 218.628, the owner or operator of a paint or ink manufacturing source shall, for the purpose of detecting leaks, conduct an equipment monitoring program as set forth below:
  - i. Each pump shall be checked by visual inspection each calendar week for indication 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.
  - ii. 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.
  - iii. 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.
- g. Pursuant to 35 Ill. Adm. Code 218.630(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.

- h. Pursuant to 35 Ill. Adm. Code 218.630(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.
- 12a. In the event that the operation of these emission units result in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the dust collector controlling all pigment additions associated with water and solvent-based ink mixing such that the dust collector is kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- 13a. Total throughputs and emissions for mixing and packaging shall not exceed the following limits:
  - i. Throughput:

<u>Inks/solutions produced</u>	<u>Throughputs</u>	
	<u>(1,000 lbs/Month)</u>	<u>(1,000 lbs/Year)</u>
Industrial Grade Ink Products	1055	10,549
Water-based Ink Products	222	2,215
Food Grade Ink	36.0	360

- ii. VOM emissions:

<u>Inks/solutions</u>	<u>Volatile Organic Material Emissions</u>		
	<u>(lbs/1,000 lbs product)</u>	<u>(lbs/Month)</u>	<u>(Tons/Year)</u>
Industrial Grade Ink Products	3.23	3,407	17.04
Water-based Ink Products	0.0302	7	0.04
Food Grade Ink	9.62	347	<u>1.73</u>
		Total:	18.81

These limits are based upon the maximum throughput, stack data for test conducted in January 2003 and the application.

iii. PM emissions:

<u>Inks/solutions</u>	<u>Particulate Matter Emissions</u>		
	<u>(lbs/Ton Pigment)</u>	<u>(Ton/Month)</u>	<u>(Tons/Year)</u>
Industrial Grade Ink Products	2	0.48	4.79
Water-based Ink Products	2	0.11	1.11
Food Grade Ink	2	0.01	<u>0.07</u>
		Total:	5.97

These limits are based upon the maximum throughput and standard emission factors (Table 6.7-1, AP 42, Fifth Edition, Volume I, May 1983).

- b. This permit is issued based on negligible emissions of Volatile Organic Material (VOM) and Hazardous Air Pollutants (HAPs) from the two 10,450 gallon underground storage tanks. For this purpose emissions from each storage tank shall not exceed nominal emissions rates of 0.1 lbs/hour and 0.44 tons/year.
  - c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.6 tons/month and 16.0 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA and the NESHAP for Miscellaneous Coating Manufacturing, 40 CFR 63 Subpart HHHHH.
  - d. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 14a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA

Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 15 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 15. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 16a. Pursuant to 40 CFR 63.11602(a), for each new and existing affected source, you must demonstrate initial compliance by conducting the inspection and monitoring activities in 40 CFR 63.11602(a)(1) and ongoing compliance by conducting the inspection and testing activities in 40 CFR 63.11602(a)(2).
- b. Pursuant to 40 CFR 63.11602(a)(1), you must conduct an initial inspection of each particulate control device according to the requirements in 40 CFR 63.11602(a)(1)(i) through (iii) and perform a visible emissions test according to the requirements of 40 CFR 63.11602(a)(1)(iv). You must record the results of each inspection and test according to 40 CFR 63.11602(b) and perform corrective action where necessary. You must conduct each inspection no later than 180 days after your applicable compliance date for each control device which has been operated within 60 days following the compliance date. For a control device which has not been installed or operated within 60 days following the compliance date, you must conduct an initial inspection prior to startup of the control device.
- i. For each wet particulate control system, you must verify the presence of water flow to the control equipment. You must also visually inspect the system ductwork and control equipment for leaks and inspect the interior of the control equipment (if applicable) for structural integrity and the condition of the control system.

- ii. For each dry particulate control system, you must visually inspect the system ductwork and dry particulate control unit for leaks. You must also inspect the inside of each dry particulate control unit for structural integrity and condition.
  - iii. An initial inspection of the internal components of a wet or dry particulate control system is not required if there is a record that an inspection meeting the requirements of 40 CFR 63.11602(a)(1) has been performed within the past 12 months and any maintenance actions have been resolved.
  - iv. For each particulate control device, you must conduct a visible emission test consisting of three 1-minute test runs using Method 203C (40 CFR Part 51, Appendix M). The visible emission test runs must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If the average test results of the visible emissions test runs indicate an opacity greater than the applicable limitation in 40 CFR 63.11601(a), you must take corrective action and retest within 15 days.
- c. Pursuant to 40 CFR 63.11602(a)(2), following the initial inspections, you must perform periodic inspections of each PM control device according to the requirements in 40 CFR 63.11602(a)(2)(i) or (ii). You must record the results of each inspection according to 40 CFR 63.11602(b) and perform corrective action where necessary. You must also conduct tests according to the requirements in 40 CFR 63.11602(a)(2)(iii) and record the results according to 40 CFR 63.11602(b).
- i. You must inspect and maintain each wet particulate control system according to the requirements in 40 CFR 63.11602(a)(2)(i)(A) through (C).
    - A. You must conduct a daily inspection to verify the presence of water flow to the wet particulate control system.
    - B. You must conduct weekly visual inspections of any flexible ductwork for leaks.
    - C. You must conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the wet control system (if applicable) to determine the structural integrity and condition of the control equipment every 12 months.
  - ii. You must inspect and maintain each dry particulate control unit according to the requirements in 40 CFR 63.11602(a)(2)(ii)(A) and (B).
    - A. You must conduct weekly visual inspections of any flexible ductwork for leaks.

- B. You must conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter (if applicable) every 12 months.
- iii. For each particulate control device, you must conduct a 5- minute visual determination of emissions from the particulate control device every 3 months using Method 22 (40 CFR Part 60, Appendix A-7). The visible emission test must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If visible emissions are observed for two minutes of the required 5-minute observation period, you must conduct a Method 203C (40 CFR Part 51, Appendix M) test within 15 days of the time when visible emissions were observed. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel HAP to a process vessel or to the grinding and milling equipment. If the Method 203C test runs indicates an opacity greater than the limitation in 40 CFR 63.11601(a)(4), you must comply with the requirements in 40 CFR 63.11602(a)(2)(iii)(A) through (C).
- A. You must take corrective action and retest using Method 203C within 15 days. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. You must continue to take corrective action and retest each 15 days until a Method 203C test indicates an opacity equal to or less than the limitation in 40 CFR 63.11601(a)(5).
  - B. You must prepare a deviation report in accordance with 40 CFR 63.11603(b)(3) for each instance in which the Method 203C opacity results were greater than the limitation in 40 CFR 63.11601(a)(5).
  - C. You must resume the visible determinations of emissions from the particulate control device in accordance with 40 CFR 63.11602(a)(2)(iii) 3 months after the previous visible determination.
17. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established

under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- 18a. Pursuant to 40 CFR 63.11602(b), you must record the information specified in 40 CFR 63.11602(b)(1) through (6) for each inspection and testing activity.
- i. The date, place, and time;
  - ii. Person conducting the activity;
  - iii. Technique or method used;
  - iv. Operating conditions during the activity;
  - v. Results; and
  - vi. Description of correction actions taken.
- b. Pursuant to 40 CFR 63.11603(c), you must maintain the records specified in 40 CFR 63.11603(c)(1) through (4) in accordance with 40 CFR 63.11603(c)(5) through (7), for five years after the date of each recorded action.
- i. As required in 40 CFR 63.10(b)(2)(xiv), you must keep a copy of each notification that you submitted in accordance with 40 CFR 63.11603(a), and all documentation supporting any Notification of Applicability and Notification of Compliance Status that you submitted.
  - ii. You must keep a copy of each Annual Compliance Certification Report prepared in accordance with 40 CFR 63.11603(b).

- iii. You must keep records of all inspections and tests as required by 40 CFR 63.11602(b).
  - iv. Your records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1).
  - v. As specified in 40 CFR 63.10(b)(1), you must keep each record for 5 years following the date of each recorded action.
  - vi. You must keep each record onsite for at least 2 years after the date of each recorded action according to 40 CFR 63.10(b)(1). You may keep the records offsite for the remaining 3 years.
19. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 20a. Pursuant to 35 Ill. Adm. Code 218.129(f), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 Ill. Adm. Code Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.
- b. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(B), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall On and after January 1, 2012, collect and record the following information each month for each cleaning operation, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2):
- i. The name and identification of each VOM-containing cleaning solution as applied in each cleaning operation;
  - ii. The VOM content of each cleaning solution as applied in each cleaning operation;
  - iii. The weight of VOM per volume and the volume of each as-used cleaning solution; and
  - iv. The total monthly VOM emissions from cleaning operations at the source.
- c. Pursuant to 35 Ill. Adm. Code 218.625(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.

- d. Pursuant to 35 Ill. Adm. Code 218.628(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.
  - e. Pursuant to 35 Ill. Adm. Code 218.637(b), every owner or operator of a source which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart AA shall maintain all records necessary to demonstrate compliance with those requirements at the source for three years.
- 21a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Records addressing use of good operating practices for the dust collector controlling all pigment additions associated with water and solvent-based ink mixing:
    - A. Records for periodic inspection of the dust collector controlling all pigment additions associated with water and solvent-based ink mixing with date, individual performing the inspection, and nature of inspection; and
    - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
  - ii. Ink/solution production by category or subcategory (1,000 lbs/month and 1,000 lbs/year)
  - iii. Pigment usage (tons/month and tons/year);
  - iv. Usage and VOM/HAP of each material used in production (lbs/month and lbs/year; % by weight);
  - v. Cleaning solution usage (lbs/month and tons/year);
  - vi. The VOM and HAP content of the as-used cleaning solutions (% by weight); and
  - vii. Monthly and annual emissions of PM, VOM, and HAPs from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

- 22a. Pursuant to 40 CFR 63.11603(a)(2), if you own or operate an existing affected source, you must submit a Notification of Compliance Status in accordance with 40 CFR 63.9(h) by June 3, 2013. If you own or operate a new affected source, you must submit a Notification of Compliance Status within 180 days after initial start-up, or by June 1, 2010, whichever is later. If you own or operate an affected source that becomes an affected source in accordance with 40 CFR 63.11599(b)(3) after the applicable compliance date in 40 CFR 63.11600 (a) or (b), you must submit a Notification of Compliance Status within 180 days of the date that you commence processing, using, or generating materials containing HAP, as defined in 40 CFR 63.11607. This Notification of Compliance Status must include the information specified in 40 CFR 63.11603(a)(2)(i) and (ii).
- i. Your company's name and address;
  - ii. A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification, a description of the method of compliance (i.e., compliance with management practices, installation of a wet or dry scrubber) and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR 63 Subpart CCCCCC.
- b. Pursuant to 40 CFR 63.11603(b), you must prepare an annual compliance certification report according to the requirements in 40 CFR 63.11603(b)(1) through (b)(3). This report does not need to be submitted unless a deviation from the requirements of 40 CFR 63 Subpart CCCCCC has occurred. When a deviation from the requirements of 40 CFR 63 Subpart CCCCCC has occurred, the annual compliance certification report must be submitted along with the deviation report.
- i. You must prepare and, if applicable, submit each annual compliance certification report according to the dates specified in 40 CFR 63.11603(b)(1)(i) through (iii).
    - A. The first annual compliance certification report must cover the first annual reporting period which begins the day of the compliance date and ends on December 31.
    - B. Each subsequent annual compliance certification report must cover the annual reporting period from January 1 through December 31.
    - C. Each annual compliance certification report must be prepared no later than January 31 and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15.

- ii. The annual compliance certification report must contain the information specified in 40 CFR 63.11603(b)(2)(i) through (iii).
    - A. Company name and address;
    - B. A statement in accordance with 40 CFR 63.9(h) of the General Provisions that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR 63 Subpart CCCCCC; and
    - C. Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31.
  - iii. If a deviation has occurred during the reporting period, you must include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken. This deviation report must be submitted along with your annual compliance certification report, as required by 40 CFR 63.11603(b)(1)(iii).
23. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 24a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(C), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall comply with the following: Notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2), ever equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment, within 30 days after the event occurs.
- b. Pursuant to 35 Ill. Adm. Code 218.637(a), upon request by the Illinois EPA, the owner or operator of an emission source which claims to be exempt from the requirements of 35 Ill. Adm. Code 218 Subpart AA shall submit records to the Illinois EPA within 30 calendar days from the date of the request which document that the emission source is in fact exempt from 35 Ill. Adm. Code 218 Subpart AA. These records shall include (but are not limited to) the percent water (by weight) in the paint or ink being produced and the quantity of Magie oil, glycol and other solvents in the ink being produced.

- c. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
- 25a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:

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

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

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

It should be noted this permit has been revised to include operation of the equipment described in construction permit 13120024.

If you have any questions on this, please call David Hulskotter at 217/785-1705.

Raymond E. Pilapil  
Acting Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

REP:DW:psj

cc: Illinois EPA, FOS Region 1

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the ink production and packaging operations in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAP) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, lower vapor pressures and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)			<u>Total HAPs</u>
	<u>PM</u>	<u>VOM</u>	<u>Single HAP</u>	
Industrial Grade Ink Products	4.79	17.04		
Water-based Ink Products	1.11	0.04		
Food Grade Ink 2 storage tanks	0.07	1.73		
	<u>-----</u>	<u>0.88</u>	<u>-----</u>	<u>-----</u>
Totals	5.97	19.69	7.9	16.0

Attachment B - Table 1 to Subpart CCCCCC of Part 63-Applicability of General Provisions to Paints and Allied Products Manufacturing Area Sources

As required in 40 CFR 63.11599, you must meet each requirement in the following table that applies to you. Part 63 General Provisions that apply for Paints and Allied Products Manufacturing Area Sources:

Citation	Subject	Applies to subpart CCCCCC
63.1	Applicability	Yes.
63.2	Definitions	Yes.
63.3	Units and abbreviations	Yes.
63.4	Prohibited activities	Yes.
63.5	Preconstruction review and notification requirements	No.
63.6(a), (b)(1)-(b)(5), (c), (e)(1), (f)(2), (f)(3), (g), (i), (j)	Compliance with standards and maintenance requirements	Yes.
63.7(a), (e), and (f)	Performance testing requirements	Yes.
63.8	Monitoring requirements	No.
63.9(a)-(d), (i), and (j)	Notification Requirements	Yes.
63.10(a), (b)(1)	Recordkeeping and Reporting	Yes.
63.10(d)(1)	Recordkeeping and Reporting	Yes.
63.11	Control device and work practice requirements	No.
63.12	State authority and delegations	Yes.
63.13	Addresses of state air pollution control agencies and EPA regional offices	Yes.
63.14	Incorporation by reference	No.
63.15	Availability of information and confidentiality	Yes.
63.16	Performance track provisions	