

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Traso Envelope Company LLC  
Attn: Robert J. Blanke  
1900 B North Austin Avenue  
Chicago, Illinois 60639-5001

Application No.: 9411007

I.D. No.: 031600FTY

Applicant's Designation:

Date Received: December 13, 1999

Subject: Envelope Manufacturing Plant

Date Issued: March 1, 2000

Expiration Date: June 4, 2001

Location: 1900 B North Austin Avenue, Chicago

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of nineteen (19) flexographic and three (3) offset lithographic envelope printing and/or folding/gluing machines, a plate washer and waste paper baling system controlled by baghouse pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits for this location.
- 2a. This permit is issued based upon the flexographic printing presses not being subject to the VOM control requirements of 35 Ill. Adm. Code Part 218 Subpart H: Printing and Publishing, Section 218.401: Flexographic and Rotogravure Printing. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year from the subject sources.
- b. This permit is issued based upon the lithographic printing presses being exempt from the requirements of 35 Ill. Adm. Code Part 218, Subpart H: Printing and Publishing, Section 218.407: Emission and Control Requirements for Lithographic Printing Lines On and After March 15, 1996. This is consequence of the combined daily emission rate of VOM

from subject presses never exceeding an applicability threshold of 100 lb/day (including solvents used for cleanup operations associated with the lithographic printing line(s)) established by Section 218.405(d)(2) and determined in accordance with Section 218.411(a)(1)(B).

- c. This permit is issued based upon the gluing operations not being subject to the VOM control requirements of 35 Ill. Adm. Code Part 218 Subpart PP: Miscellaneous Fabricated Product Manufacturing Process. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year from the subject sources.

- 3. Usage of raw materials and VOM emissions shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u> (wt %)	<u>VOM Emissions</u>	
	(tons/mo)	(tons/yr)		(Tons/mo)	(Tons/yr)
Inks	10	100	6.52	0.65	6.5
Glue	60	650	1.75	1.05	11.4
Photopolymer Plate					
Washout	0.3	3	12.0	0.04	<u>0.4</u>
				Total	18.3

These limits define the potential emissions of the VOM and HAPs and are based on the maximum actual emissions determined from the maximum production capacity as limited by this permit. 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.

- 4. This permit is issued based on the usage of non-VOM cleaning solutions;
- 5. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Agency. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Agency.
- 6. This permit is issued based on negligible emissions of particulate matter from the waste paper baling system. For this purpose emissions shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 ton/year.
- 7. The Permittee shall maintain monthly records of the following items separately for flexographic and lithographic printing presses:
  - a. Name and amount of inks used (tons/mo, tons/yr);

- b. Name and amount of glues used (tons/mo, tons/yr);
  - c. Name and amount of solvents and fountain solutions used (tons/mo, tons/yr);
  - d. Name and amount of other VOM containing materials used (tons/mo, tons/yr);
  - e. VOM and HAP content in items (a) ... (d) (wt %).
  - f. Numbers of days during the month when the lithographic printing presses were in operation.
8. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA request for records during the course of a source inspection.
9. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, a description of the exceedances or violation, and efforts to reduce emissions and future occurrences.
10. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the nuisance.
11. The Permittee shall submit the following additional information from the prior calendar year, along with the Annual Emissions Report, due May 1st of each year:
- a. names and amounts of inks, glues and solvents used (Tons/year);
  - b. their VOM and HAP content (wt %);
12. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

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

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

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

It should be noted that this permit has been revised to include operation of one flexographic printing press described in the construction permit 99120037 and to reflect removal of three printing presses without any increase in VOM emissions. This revision does not relax monitoring, recordkeeping, or reporting requirements contained in federally enforceable conditions of this permit. These permit conditions assure that this source would not be a major source for purpose of CAAPP.

If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

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

DES:VJB:psj

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

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Envelope Manufacturing Facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency used the annual operating scenario which results in maximum emissions from such a plant. This is use of 100 tons of inks and 650 tons of glue per year. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

1. Emissions of VOM from the printing/gluing operations:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u> (wt %)	<u>VOM Emissions</u>	
	(Tons/mo)	(Tons/yr)		(Tons/mo)	(Tons/yr)
Inks	10	100	6.52	0.65	6.5
Glue	60	650	1.75	1.05	11.4
Photopolymer Plate					
Washout	0.3	3	12.0	0.04	<u>0.4</u>
				Total	18.3

2. As a consequence of the requirements of this permit, the emissions of hazardous air pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from this source will be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs so that HAP emissions do not trigger the requirements to obtain a Clean Air Act Permit Program permit from the Agency.
3. This permit is issued based on negligible emissions of particulate matter from the waste paper baling system. For this purpose emissions shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 ton/year.

DES:VJB:psj



