

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Tempo Graphics, Inc.
Attn: Mr. Kim Hardin
455 East North Avenue
Carol Stream, Illinois 60188

<u>Application No.:</u> 86110033	<u>I.D. No.:</u> 043020ABI
<u>Applicant's Designation:</u>	<u>Date Received:</u> August 1, 2005
<u>Subject:</u> Offset Printing Plant	
<u>Date Issued:</u> August 24, 2007	<u>Expiration Date:</u> April 10, 2011
<u>Location:</u> 455 East North Avenue, Carol Stream	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of three web-heatset-offset presses (Harris M100, Didde C1000 and Harris 600) with three dryers all controlled by one regenerative thermal oxidizer (RTO), two non-heatset offset presses, exhaust starch spray powder, and natural-gas-combustion heaters 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., VOM less than 100 tons per year, individual HAP less than 10 tons per year, combined HAP less than 25 tons per year). As a result the source is excluded from the requirement 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 initial issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. This permit is issued based upon the 3 heatset-web-offset printing presses being controlled by thermal oxidizer. The thermal oxidizer is required to be operated at all times when any of the web-heatset-offset presses are in operation.
- b. The RTO shall be preheated to the manufacturer's recommended temperature but not lower than the temperature of the most recent compliance test for the RTO, before the printing process is begun; this temperature shall be maintained during the printing process.
- c. The RTO shall be equipped with continuous temperature indicators and strip chart recorders for the afterburner combustion chamber temperatures that meet the requirements of 35 Ill. Adm. Code 218.105(d)(2).

3a. Operation of all printing operations shall not exceed the following limits:

i. Heatset-web-offset presses:

A. Source-wide:

<u>Material</u>	VOM		VOM Emissions		
	<u>Content % Weight</u>	<u>Material Usage (Tons/Mo)</u>	<u>Material Usage (Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Ink	40%	50.00	400.00	1.12	8.96
Fountain Solution	20%	2.81	22.50	0.20	1.57
Additives					
Automatic Blanket Wash	100%	0.20	1.50	0.10	0.81
Manual Wash	100%	3.25	26.00	1.63	13.00
Scratch Off	50%	0.40	2.00	0.02	<u>0.16</u>
				Total	24.50

These limits are based on the potential emissions from all heatset-web-offset presses and are based on 93% destruction efficiency by the regenerative thermal oxidizer, 20% retention of ink, 70% capture efficiency of FSA by thermal oxidizer, 90% capture efficiency of scratch off solution, 50% retention of manual wash and material balance.

B. Harris M600 Press:

<u>Material</u>	VOM		VOM Emissions		
	<u>Content % Weight</u>	<u>Material Usage (Tons/Mo)</u>	<u>Material Usage (Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Ink	40%	6.47	77.58	0.21	2.48
Fountain Solution	10%	0.24	2.90	0.01	0.02
Wash Solvent	100%	0.53	6.38	0.53	6.38
Misc. Material	6.9 lb/gal	0.48	5.80	0.06	<u>0.73</u>
				Total:	9.61

The above limitations were established in Permit 94060126, pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203.

C. Didde C1000 Press:

<u>Material</u>	<u>VOM Content % Weight</u>	<u>Material Usage (Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>VOM Emissions (lb/Mo)</u>	<u>(Tons/Yr)</u>
Ink	40%	3.55	42.5	160	1.00
Fountain Solution Additives	20%	0.18	2.15	30	0.20
Automatic Blanket Wash	100%	0.10	1.00	158	0.94
Manual Wash	100%	0.20	3.40	320	1.94
Scratch Off	50%	0.40	2.00	9	<u>0.05</u>
				Total:	4.13

The above limitations were established in Permit 98010052, pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203.

ii. Non-heatset offset presses:

<u>Material</u>	<u>VOM Content % Weight</u>	<u>Material Usage (Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>VOM Emissions (Tons/Mo)</u>	<u>(Tons/Yr)</u>
Ink	40%	3.75	30.0	0.08	0.6
Fountain Solution Additives	5%	0.75	6.0	0.04	0.3
Manual Wash	100%	0.38	3.0	0.19	1.5

These limits are based on potential emissions from all non-heatset presses and are based on 95% retention factor for ink, 50% retention factor for manual wash and material balance.

- b. Emissions from and the use of miscellaneous products (adjuncts, wash, process oils) and the related emissions shall not exceed:

<u>Material</u>	<u>VOM Content % Weight</u>	<u>Material Usage (Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>VOM Emissions (Tons/Mo)</u>	<u>(Tons/Yr)</u>
Misc. Product	35%	2.08	25.0	0.73	8.75

These limits are based on maximum emissions from miscellaneous product usage and are based on material balance.

- c. 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).

- 4a. The fountain solution for all presses shall not exceed 5% (by volume) VOM content as applied. The fountain solution shall not contain alcohol. This is to demonstrate compliance with 35 Ill. Adm. Code 218.407(a)(1)(A)(iii), (a)(2) and (a)(3)(B).
- b. The clean-up solutions, as used, shall not exceed 30% (by weight) VOM, pursuant to 35 Ill. Adm. Code 218.207(a)(4)(A).
- c. The VOM cleaning materials, including used cleaning towels, shall be kept, stored and disposed of in closed containers, pursuant to 35 Ill. Adm. Code 218.407(a)(5).
- 5a. Natural gas consumption for use in printing ovens, afterburners, and other fuel combustion sources shall not exceed 50 million cubic feet per year.
- b. Natural gas shall be the only fuel used for the ovens and afterburners and other fuel combustion sources.
- c. Records of natural gas consumption shall be maintained. Records of cubic feet per month and year shall be retained for three years.
- 6a. Within 90 days of a written request from the Illinois EPA the Permittee shall submit data on the VOM contents of the representative materials applied on the printing presses determined by laboratory analysis in accordance with 35 Ill. Adm. Code Section 218.105.
- b. The submitted data shall include: the VOM content of the materials, a justification of why these are representative, a description of the sampling procedures, and documentation for the analysis.
- c. The Illinois EPA may provide additional time for the performance of this testing upon request from the Permittee which shows that it is not feasible to perform representative testing within 90 days.
7. Within 90 days of a written request from the Illinois EPA the volatile organic emissions of the RTO controlling the heatset offset printing presses shall be measured by an approved testing service, during conditions which are representative of maximum emissions.
8. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the Illinois EPA: Refer to 40 CFR 60, Appendix A for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Volatile Organic Material	USEPA Method 25A
9. These tests shall be performed to show that the RTO system reduces VOM emissions from the printing dryers by 93%.

10. The Illinois EPA shall be notified in writing a minimum of thirty (30) days prior to the expected date of these tests and further notified a minimum of five (5) working days prior to the test of the exact date, time and place of these tests, to enable the Illinois EPA to witness these tests.
11. Copies of Final Report(s) for these tests shall be submitted to the Illinois EPA within fourteen (14) days after the test results are compiled and finalized.
12. The Final Report shall include as a minimum:
 - a. A summary of results.
 - b. General information.
 - c. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - d. Detailed description of test conditions, including:
 - i. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption;
 - ii. Control equipment information, i.e., equipment condition and operating parameters during testing; and
 - iii. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - e. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - f. An explanation of any discrepancies among individual tests or anomalous data.
 - g. The results of all quality control evaluation, including a copy of all quality control data.
13. Submittals of information shall be made as follows:
 - a. Submittal of Test Plan - one copy to Source Emission Test Specialist and one copy to Permit Section.
 - b. Notices of Test - one copy to Source Emission Test Specialist, one copy to the Regional Office, and one copy to Permit Section.
 - c. Final Report - one copy to Source Emission Test Specialist, one copy to the Regional Office, and one copy to Permit Section.

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

Illinois Environmental Protection Agency
Attn: Source Emission Test Specialist
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

14. The emissions of Hazardous Air Pollutants (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 in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. 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.
- 15a. This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 Ill. Adm. Code Part 205, pursuant to 35 Ill. Adm. Code 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.
 - b. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures that may be specified in this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
 - c. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a

participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in a Clean Air Act Permit Program (CAAPP) permit or a Federally Enforceable State Operating Permit (FESOP).

- d. Pursuant to 35 Ill. Adm. Code 205.316(a), any participating or new participating source shall not operate without a CAAPP permit or FESOP. Pursuant to 35 Ill. Adm. Code 205.316(a)(2), if a participating or new participating source does not have a CAAPP permit containing ERMS provisions and the source elects to obtain a permit other than a CAAPP permit, the source shall apply for and obtain a revised FESOP that contains, in addition to other necessary provisions, federally enforceable ERMS provisions, including baseline emissions, allotment for each seasonal allotment period, identification of any units deemed to be insignificant activities for purposes of the ERMS, emissions calculation methodologies, and provisions addressing all other applicable requirements of 35 Ill. Adm. Code Part 205.
16. The Permittee shall maintain records of the following items:
 - a. Monthly and annual usage of all VOM and HAP materials.
 - b. VOM and HAP contents of the materials used (as applied).
 - c. VOM and HAP emissions per month and per year.
 - d. Control device monitoring equipment data.
 - e. A record of operating time for the control device, monitoring equipment and the associated printing lines.
 - f. A maintenance log for the control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
 17. 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 or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
 18. 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, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

19. 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
9511 West Harrison
Des Plaines, Illinois 60016

Please note that this permit is revised to incorporate changes to Condition 3a and 14 as described in construction permit 07050071.

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

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

Date Signed: _____

ECB:BDB:jws

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

Attachment A - Emission Summary

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

<u>Equipment</u>	<u>VOM</u>	<u>E M I S S I O N S (Tons/Year)</u>			<u>CO</u>
		<u>Single HAP</u>	<u>Combined HAPs</u>	<u>NO_x</u>	
Heatset Offset Presses	38.24				
Non-Heatset Offset Presses	2.40				
Miscellaneous Product	8.75				
Fuel Combustion	<u>0.14</u>			<u>2.5</u>	<u>2.0</u>
Total:	49.53	< 10	< 25	2.5	2.0

BDB: