

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
J.S. Paluch Company, Inc. for
Federally Enforceable State Operating Permit (FESOP) for
3708 North River Road, Suite 400
Franklin Park, Illinois 60131

Site Identification No.: 031096ANZ

Application No.: 10020032

Schedule

Public Comment Period Begins: June 23, 2010

Public Comment Period Closes: July 23, 2010

Illinois EPA Contacts

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I. INTRODUCTION

J.S. Paluch Company has voluntarily applied for an operating permit for its printing facility in order to incorporate federally enforceable limits. These limits would prevent the facility from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the revised permit that it would propose to issue for the plant. However, before issuing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

II. SOURCE DESCRIPTION

J.S. Paluch Company is a lithographic printing facility. The company operates eleven non-heatset web offset lithographic printing presses. All presses are sources of emissions because the printing inks and cleaning solutions contain organic solvents, which are emitted to the atmosphere during the printing process as volatile organic material (VOM). The solvents also contain components that are considered hazardous air pollutants (HAPs).

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has to operate this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the Clean Air Act and regulations promulgated thereunder. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source for this program. The permit acts to restrict the plant's potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The federally enforceable limitations of the annual seasonal VOM emissions also allow the source to avoid participation in the Emissions Reduction Market System (ERMS).

The FESOP limits the operation and annual emissions of the plant to below the major-source thresholds of 10 tons for an individual HAP and 25 tons for combined HAPs and potential emissions of VOM to less than 100 tons per year.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The board has specific standards for units emitting volatile organic material in the Greater Chicago area, e.g., 35 IAC, Part 218, Subpart H – Printing and Publishing. However, the source is eligible for exemption from the control requirements of this subpart, pursuant to provisions of 35 Ill. Adm. Code 218.405(d)(2).

The paper coating operations performed on the printing presses are subject to VOM emission limitations found in 35 IAC 218.204(c).

The source VOM emissions are subject to the general VOM emission limitation found in 35 IAC 218.301 – Use of Organic Material.

The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

The permit that the Illinois EPA is proposing to issue identifies the specific emission standards that apply to the emission units at the plant. As explained, the printing presses are subject to 35 IAC 218.301, which restricts VOM emissions from any emission unit to less than 8 lb/hr. The paper coating operations are subject to VOM content limitations of 35 IAC 218.204(c) which limits VOM content of the coatings to 2.3 pounds per gallon of coating. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 10 tons for an individual HAP and 25 tons for combined HAPs and 100 tons for VOM. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit conditions would also continue to require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to renew the 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 IAC Part 166.