217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

General Packaging Products, L.L.C.
Attn: William Troth, Vice President, Manufacturing
1700 South Canal Street
Chicago, Illinois 60616

Application No.: 95050166 I.D. No.: 031600BTT
Applicant's Designation: Date Received: August 16, 2012
Subject: Printing and Converting of Protective Packaging
Date Issued: December 12, 2013 Expiration Date: December 12, 2023
Location: 1700 South Canal Street, Chicago, Cook County, 60616

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of rotogravure printing press W15, flexographic printing press W16, 6/c CI flexographic printing press W17, flexographic printing press W19, flexographic printing press W35, flexographic printing press W14, flexographic printing press W18, polyglycerol coating, paper slitters and trim blower system, roll doctors and trim blower system, and natural gas fired dryers 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:

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), 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year of 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.

b. Prior to 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. 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 form 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), 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).

3. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

4a. 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 shall apply only to photochemically reactive material.

b. Pursuant to 35 Ill. Adm. Code 218.401(a)(2)(B), no owner or operator of a subject flexographic or rotogravure printing line shall apply at any time any coating or ink unless the VOM content does not exceed the limitation specified in either 35 Ill. Adm. Code 218.401(a)(1) or (a)(2), as applicable. Compliance with 35 Ill. Adm. Code 218.401 must be demonstrated through the applicable coating or ink analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.404(c). As an alternative to compliance with 35 Ill. Adm. Code 218.401(a), a subject printing line may meet the requirements of 35 Ill. Adm. Code 218.401(b) or (c). On and after August 1, 2010 for owners or operators of flexographic or rotogravure printing lines that print flexible packaging, or that print flexible packaging and non-flexible packaging on the same line, either:

i. 0.8 kg VOM/kg (0.8 lbs VOM/lb) solids applied; or

ii. 0.16 kg VOM/kg (0.16 lbs VOM/lb) inks and coatings applied.

c. Pursuant to 35 Ill. Adm. Code 218.401(b)(3), on and after August 1, 2010, no owner or operator of a subject flexographic or rotogravure printing line that prints flexible packaging, or that prints flexible packaging and non-flexible packaging on the same line, shall apply coatings or inks on the subject printing line unless the weighted average, by volume, VOM content of all coatings and inks as applied each day on the subject printing line does not exceed the limitation specified in either 35 Ill. Adm. Code 218.401(a)(2)(B)(i) (calculated in accordance with the equation in 35 Ill. Adm. Code 218.401(b)(3)(A)) or 35 Ill. Adm. Code 218.401(a)(2)(B)(ii) (calculated in accordance with the equation in 35 Ill. Adm. Code 218.401(b)(3)(B)). Compliance with 35 Ill. Adm. Code 218.401(b)(3) must be demonstrated through the applicable coating or ink analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.404(d).

5a. This permit is issued based upon the flexographic and rotogravure printing presses at this source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK. This is a result of the federally enforceable limitations of this permit restricting potential HAP emissions to below major source threshold levels defined in 40 CFR 63.2.

b. This permit is issued based upon the source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ. Pursuant to 40 CFR 63.3290, the provisions of 40 CFR 63 Subpart JJJJ apply to each new and existing facility that is a major source of HAP, as defined in 40 CFR 63.2, at which web coating lines are operated.

6. 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.

7a. This permit is issued based on the 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)(2)(B)(i), notwithstanding 35 Ill. Adm. Code 218.187(a)(1) cleaning operations for emission units within the flexible package printing source category shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (e), (f), and (g).

b. Pursuant to 35 Ill. Adm. Code 218.204(c)(3), the paper coating limitation set forth in 35 Ill. Adm. Code 218.204(c) shall not apply to any owner or operator of any paper coating line on which flexographic,

rotogravure, lithographic, or letterpress printing is performed if the paper coating line complies with the applicable emissions limitations in 35 Ill. Adm. Code 218 Subpart H. In addition, screen printing on paper is not regulated as paper coating, but is regulated under 35 Ill. Adm. Code 218 Subpart TT. On and after May 1, 2011, the paper coating limitation shall also not apply to coating performed on or in-line with any digital printing press, or to size presses and on-machine coaters on papermaking machines applying sizing or water-based clays.

c. Pursuant to 35 Ill. Adm. Code 218.402(c), upon achieving compliance with 35 Ill. Adm. Code 218 Subpart H, the flexographic and rotogravure printing lines are not required to meet 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302). Flexographic and rotogravure printing lines exempt from 35 Ill. Adm. Code 218 Subpart H are subject to 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302). Rotogravure or flexographic equipment used for both roll printing and paper coating is subject to 35 Ill. Adm. Code 218 Subpart H.

8a. 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 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 the 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

v. 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.

9a. Pursuant to 35 Ill. Adm. Code 218.401(d), no owner or operator of subject flexographic or rotogravure printing lines that print flexible packaging or print flexible packaging and non-flexible packaging on the same line shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with the subject flexographic or rotogravure printing lines to be kept, stored, or disposed of in any manner other than in closed containers, or conveyed from one location to another in any manner other than in closed containers or pipes, except when specifically in use.

b. Pursuant to 35 Ill. Adm. Code 218.403(e), no owner or operator of a flexographic or rotogravure printing line complying by means of 35 Ill. Adm. Code 218.401(a)(2), (b)(2), or (b)(3) or complying by means of 35 Ill. Adm. Code 218.401(c)(2), (c)(3), or (c)(4), shall operate the printing line on or after August 1, 2010, unless the owner or operator has complied with, and continues to comply with, 35 Ill. Adm. Code 218.401(a)(2), (b)(2) or (b)(3), and 35 Ill. Adm. Code 218.401(c), as applicable, and all applicable provisions in 35 Ill. Adm. Code 218.404.

c. Pursuant to 35 Ill. Adm. Code 218.403(f), no owner or operator of a flexographic or rotogravure printing line that prints flexible packaging, or that prints flexible packaging and non-flexible packaging on the same line, shall operate the printing line on or after August 1, 2010, unless the owner or operator has complied with, and continues to comply with, 35 Ill. Adm. Code 218.401(d) and 35 Ill. Adm. Code 218.404(g).

d. Pursuant to 35 Ill. Adm. Code 218.403(g), no owner or operator of a flexographic or rotogravure printing line that prints flexible packaging, or that prints flexible packaging and non-flexible packaging on the same line, and that is exempt from the limitations of 35 Ill. Adm. Code 218.401(d) because of the criteria in 35 Ill. Adm. Code 218.402(b) shall operate the printing line on or after August 1, 2010, unless the owner or operator has complied with, and continues to comply with, 35 Ill. Adm. Code 218.402(b) and 35 Ill. Adm. Code 218.404(f).

10. In the event that the operation of this emission unit 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 odor nuisance.

11a. Emissions and operation of Printing Line W19 shall not exceed the following limits:

VOM Usage		VOM Emissions	
(Lbs/Month)	(Tons/Year)	(Lbs/Month)	(Tons/Year)
1000	5.00	1000	5.00

These limits are based on the maximum actual emissions resulting from the maximum actual ink and clean-up solvent usage and the maximum VOM contents in the inks and clean-up solvent. The above limitations contain revisions to previously issued Permit 96050035. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit. The source has requested these revisions and has addressed the applicability and compliance of Title I of the Clean Air Act, specifically 35 Ill. Adm. Code 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. Specifically, the limitations on the usage on individual inks and solvents has been eliminated and the permitted VOM emissions has been decreased from 9.79 tons/year to 5.00 tons/year.

b. Emissions and operation of Printing Line W35 shall not exceed the following limits:

	VOM Usage		VOM Emissions	
Material	(Lbs/Month)	(Tons/Year)	(Lbs/Month)	(Tons/Year)
Low VOM Ink	1000	5.00	1000	5.00

These limits are based on the maximum actual emissions resulting from the maximum actual ink usage and the maximum VOM content of the inks. The above limitations contain revisions to previously issued Permit 97010077. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit. The source has requested these revisions and has addressed the applicability and compliance of Title I of the Clean Air Act, specifically 35 Ill. Adm. Code 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. Specifically, the limitations on the usage on individual inks has been eliminated and the permitted VOM emissions has been decreased from 5.78 tons/year to 5.00 tons/year.

c. Emissions of VOM from the W17 6-color CI Flexo Press #3 with wax module shall not exceed the following limits:

VOM Emissions (Tons/Month)	VOM Emissions (Tons/Year)
1.3	12.94

These limits are based on maximum actual emissions resulting from the maximum actual ink usage and the maximum VOM contents of the inks. The above limitations contain revisions to previously issued Permit 97010077. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit. The source has requested these revisions and has addressed the applicability and compliance of Title I of the Clean Air Act, specifically 35 Ill. Adm. Code 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. Specifically, the permitted VOM emissions has been increased from 5.78 tons/year to 12.94 tons/year.

d. Emissions and operation of Printing Lines W15 and W16 shall not exceed the following limits:

	VOM Usage		VOM Emissions	
Material	(Tons/Month)	(Tons/Year)	(Tons/Month)	(Tons/Year)
Ink	4.7	47.0	4.7	47.0

These limits are based on maximum operation and material balance. The above limitations were established in Construction Permit 13060044, pursuant to 35 Ill. Adm. Code 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 Ill. Adm. Code Part 203.

e. Emissions and operation of Printing Press W-18 shall not exceed the following limits:

	Material Usage		VOM Content	VOM Emissions	
Material	(Lbs/Mo)	(Tons/Yr)	(% by Weight)	(Lbs/Mo)	(Tons/Yr)
Coatings and Inks	11,500	69.0	8.0	920	5.52
Cleanup Solvent	250	1.5	100.0	250	1.50
			Totals	1170	7.02

These limits are based on the maximum usage of inks and solvents, the maximum VOM content of these materials, and the maximum actual emission rates. The above limitations were established in Construction Permit 93120039, pursuant to 35 Ill. Adm. Code 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 Ill. Adm. Code Part 203.

f. Emissions and Operation of Printing Press W-14 shall not exceed the following limits:

VOM Usage		VOM Emissions	
(Tons/Month)	(Tons/Year)	(Tons/Month)	(Tons/Year)
0.05	0.50	0.05	0.50

The above limitations are based on the maximum usage of inks and solvents, the maximum VOM content of these materials, and material balance. The above limitations contain revisions to previously issued Permit 02060065. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit. The source has requested these revisions and has addressed the applicability and compliance of Title I of the Clean Air Act, specifically 35 Ill. Adm. Code 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. Specifically, the limitations on the usage on inks and cleaning materials has been replaced by a VOM usage limit and the permitted VOM emissions has been decreased from 5.78 tons/year to 0.50 tons/year.

g. This permit is issued based on negligible emissions of particulate matter from the paper slitters and trim blower system. For this purpose, emissions from this unit shall not exceed nominal emission rates of 0.1 lb/hr and 0.44 tons/year.

h. This permit is issued based on negligible emissions of particulate matter from the roll doctors and trim blower system. For this purpose, emissions from this unit shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.

i. The VOM/HAP emissions shall be calculated using the following equations:

$$E = \sum U \times C_i - W \times C_w$$

Where:

E = VOM/HAP emissions (tons);

U = VOM/HAP-containing raw materials usage (tons);

C_i = VOM/HAP content of raw materials (weight fraction);

W = Certified amount of waste disposed (tons); and

C_w = Certified VOM/HAP content of the waste (weight fraction).

j. Operation and emissions of the natural gas fired dryers shall not exceed the following limits:

i. Natural Gas Usage: 7.2 mmscf/month and 72 mmscf/year

ii. Emissions from the combustion of natural gas:

Pollutant	Emission Factor (lbs/mmscf)	Emissions (Tons/Mo)	Emissions (Tons/Yr)
Carbon Monoxide (CO)	84	0.30	3.02
Nitrogen Oxides (NO_x)	100	0.36	3.60
Particulate Matter (PM)	7.6	0.03	0.27
Sulfur Dioxide (SO_2)	0.6	0.01	0.02
Volatile Organic Material (VOM)	5.5	0.02	0.20

These limits are based on the maximum equipment operations and standard emission factors (Tables 1.4-1 and 1.4-2 or AP-42, Volume I, Fifth Edition, Supplement D, July 1998).

k. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/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.

l. 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).

12a. 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 Conditions 13 and 14 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

13. Pursuant to 35 Ill. Adm. Code 212.110(c), upon 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.

14. Pursuant to 35 Ill. Adm. Code 218.404(a), the VOM content of each coating and ink and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.404.

15a. 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.

16. 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.

17a. Pursuant to 35 Ill. Adm. Code 218.404(c)(2), on and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, or on and after the initial start-up date, the owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(a) shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:

i. The name and identification number of each coating and ink as applied on each printing line.

ii. The VOM content of each coating and ink as applied each day on each printing line.

b. Pursuant to 35 Ill. Adm. Code 218.404(d)(2), on and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, or on and after the initial start-up date, the owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(b) shall collect and record all of the following information each day for each printing line and maintain the information at the source for a period of three years:

i. The name and identification number of each coating and ink as applied on each printing line.

ii. The VOM content and the volume, or weight of solids, as applicable, of each coating and ink as applied each day on each printing line.

iii. The daily-weighted average VOM content of all coatings and inks as applied on each printing line.

c. Pursuant to 35 Ill. Adm. Code 218.404(h), all records required by 35 Ill. Adm. Code 218.404(f) and (g) shall be retained for at least three years and shall be made available to the Illinois EPA upon request.

18a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:

i. Total usage of each ink, coating, cleaning solvents, and any other VOM containing materials on a monthly and annual basis in terms of pounds per month and tons per year;

ii. The VOM content of each ink, coating, cleaning solvents, and any other VOM containing materials used in terms of % VOM by weight with basis, accompanied by a copy of the supporting information, e.g., supplier data sheet or laboratory analysis report;

iii. Total VOM emissions from printing lines;

iv. Natural gas usage (mmscf/month, mmscf/year); and

v. Monthly and annual emissions of CO, NO_x, PM, SO_2, 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.

19a. 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.

20a. Pursuant to 35 Ill. Adm. Code 218.404(c), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(a) shall comply with the following:

i. By a date consistent with 35 Ill. Adm. Code 218.106, or Section 218.403(e), as applicable, or upon initial start-up of a new printing line, or upon changing the method of compliance from an existing subject printing line from 35 Ill. Adm. Code 218.401(b) or 35 Ill. Adm. Code 218.401(c) of this Part to Section 218.401(a), the owner or operator of a subject printing line shall certify to the Illinois EPA that the printing line will be

in compliance with 35 Ill. Adm. Code 218.401(a) on and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, or on and after the initial start-up date. The owner or operator of a printing line subject to the requirements in 35 Ill. Adm. Code 218.401(a)(2)(B) shall certify in accordance with this 35 Ill. Adm. Code 218.404(c)(1) even if the owner or operator of such line submitted a certification prior to January 1, 2010. Such certification shall include:

A. The name and identification number of each coating and ink as applied on each printing line.

B. The VOM content of each coating and ink as applied each day on each printing line.

ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, 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 Ill. Adm. Code 218.401(a) 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 Ill. Adm. 218.401 from 35 Ill. Adm. Code 218.401(a) to 35 Ill. Adm. Code 218.401(b) or (c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(d)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(a) to 35 Ill. Adm. Code 218.401(b) or (c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(d) or (e), respectively.

b. Pursuant to 35 Ill. Adm. Code 218.404(d)(3), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(b) shall comply with the following:

i. By a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, or upon initial start-up of a new printing line, or upon changing the method of compliance for an existing subject printing line from 35 Ill. Adm. Code 218.401(a) or (c) to 35 Ill. Adm. Code 218.401(b), the owner or operator of the subject printing line shall certify to the Illinois EPA that the printing line will be in compliance with 35 Ill. Adm. Code 218.401(b) on and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, or on and after the initial start-up date. The owner or operator of a printing line subject to the requirements in 35 Ill. Adm. Code

218.401(b)(3) shall certify in accordance with 35 Ill. Adm. Code 218.404(d)(1) even if the owner or operator of such line submitted a certification prior to January 1, 2010. Such certification shall include:

A. The name and identification number of each printing line which will comply by means of 35 Ill. Adm. Code 218.401(b).

B. The name and identification number of each coating and ink available for use on each printing line.

C. The VOM content of each coating and ink as applied each day on each printing line.

D. The method by which the owner or operator will accurately calculate the volume, or weight of solids, as applicable, of each coating and ink as applied each day on each printing line.

E. The method by which the owner or operator will create and maintain records each day as required in 35 Ill. Adm. Code 218.404(d)(2).

F. An example of the format in which the records required in 35 Ill. Adm. Code 218.404(d)(2) will be kept.

ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, 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 Ill. Adm. Code 218.401(b) 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 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(b) to 35 Ill. Adm. Code 218.401(a) or (c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(c)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(b) to 35 Ill. Adm. Code 218.401(a) or (c), the owner or operator shall comply with the requirements of 35 Ill. Adm. Code 215.404(c) or (e), respectively.

c. Pursuant to 35 Ill. Adm. Code 218.404(g)(2), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401(d) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.401(d) by sending a description of the violation and copies of records documenting such violations to the Illinois EPA within 30 days following the occurrence of the violation.

21a. 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

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:DWH:psj

cc: Illinois EPA, FOS Region 1
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 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 HAPs) 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.

	E M I S S I O N S (Tons/Year)						
Emission Unit	CO	NO_x	PM	SO_2	VOM	Single HAP	Combined HAPs
Flexographic Printing Press W19					5.0		
Flexographic Printing Press W18					7.02		
Flexographic Printing Press W35					5.0		
W17 6-Color CI Flexo Press #3					12.94		
Printing Presses W15 and W16					47.00		
Flexographic Printing Press W14					0.5		
Paper Slitters & Trim Blower System			0.44				
Roll Doctors and Trim Blower System			0.44				
Fuel Combustion Dryers	3.02	3.60	0.27	0.02	0.20		
Polyglycerol Coating	---	---	---	---	0.44	---	---
Totals	3.02	3.60	1.15	0.02	78.10	9.0	22.5

Attachment B – Emissions Reduction Market System (ERMS)

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 Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. 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 in the sources’ 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 Ill. Adm. Code 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 Ill. Adm. Code 205.500 and 35 Ill. Adm. Code 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 Ill. Adm. Code 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 Ill. Adm. Code 205.630).

2. Applicability

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

3. Obligation to Hold Allotment Trading Units (ATUs)

a. Pursuant to 35 Ill. Adm. Code 205.150(c)(1) and 35 Ill. Adm. Code 205.720, and as further addressed by Condition 8 of this Attachment, 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 5 of this Attachment.

i. VOM emissions from emission units that the Illinois EPA determines would qualify as insignificant activities under 35 Ill. Adm. Code 201.Subpart F if the source were a CAAPP source and for which a statement to this effect is contained in the FESOP for a participating or new participating source are exempt from the requirements of 35 Ill. Adm. Code Part 205, in accordance with 35 Ill. Adm. Code 205.220(b);

ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit for sources permitted to operate during startup, malfunction or breakdown pursuant to 35 Ill. Adm. Code 201.262, in accordance with 35 Ill. Adm. Code 205.225;

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

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

v. VOM emissions from certain new and modified emission units as addressed by Condition 8(b) of this Attachment, if applicable, in accordance with 35 Ill. Adm. Code 205.320(f).

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

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 Ill. Adm. Code 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 Ill. Adm. Code 205.610(b).

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

5. Emissions Excursion Compensation

Pursuant to 35 Ill. Adm. Code 205.720, if the source fails to hold ATUs in accordance with Condition 3 of this Attachment, 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 Ill. Adm. Code 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. Quantification of Seasonal VOM Emissions

a. The methods and procedures specified in 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 Ill. Adm. Code 205.315(b)]:

No exceptions

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

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 Ill. Adm. Code 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 Ill. Adm. Code 205.337;

iv. If a source has experienced an emergency, as provided in 35 Ill. Adm. Code 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 Ill. Adm. Code

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 Ill. Adm. Code 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 Ill. Adm. Code 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 October 31 of each year, for the preceding seasonal allotment period.

8. Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 129 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 12.8449 tons per season.

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 Ill. Adm. Code 205.405, including units complying with MACT or using BAT, as identified in Condition 10 of this Attachment 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 3(a) of this Attachment 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

None

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 Ill. Adm. Code Part 205, including:

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

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

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

9. Recordkeeping for ERMS

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

a. Seasonal component of the Annual Emissions Report;

b. Information on actual VOM emissions, as recorded and as required by Condition 18(a) of this permit and Condition 6(a) of this Attachment; and

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

10. Exclusions from Further Reductions

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

i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the Clean Air Act;

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 Ill. Adm. Code 205.405(a) and (c)]:

Fuel Combustion Emission Units

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 Ill. Adm. Code 205.400(c) or (e) as

long as such emission unit continues to use such BAT [35 Ill. Adm. Code 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 Ill. Adm. Code 205.405(b) and (c)]:

None

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