

217/782-2113

LIFETIME OPERATING PERMIT

PERMITTEE

Decor Gravure Corporation
Attn: John Cwiok
1077 Sesame Street
Bensenville, Illinois 60106

Application No.: 77050071

I.D. No.: 031414AAJ

Applicant's Designation:

Date Received: May 22, 2000

Subject: Vinyl Coating Presses

Date Issued: February 26, 2001

Expiration Date: See Condition 1.

Location: 1077 Sesame Street, Bensenville

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Three Vinyl Coating Presses with Permanent Total Enclosure and Thermal Oxidizer, and
One Gas-Fired Boiler

pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This permit shall expire 180 days after the Illinois EPA sends a written request for the renewal of this permit.
- b. This permit shall terminate if it is withdrawn or is superseded by a revised permit.
- 2a. Press number 3 is subject to New Source Performance Standards (NSPS), 40 CFR 60, Subpart FFF: Flexible Vinyl and Urethane Coating and Printing. The Illinois EPA is administering this regulation in Illinois on behalf of the United States EPA under a delegation agreement.
- b. This permit is issued based upon the 3 vinyl coating presses being controlled by a thermal oxidizer. The thermal oxidizer shall have a destruction efficiency greater than 90% and an overall control efficiency greater than 85% in order to demonstrate compliance with 35 Ill. Adm. Code 218.207(b) and NSPS, Subpart FFF, 40 CFR 60.582(a)(2).
3. The thermal oxidizer is required to be operated at all times when the three vinyl coating presses are in operation.
- 4a. The thermal oxidizer combustion chambers shall be preheated to the manufacturer's recommended temperature but not lower than 1400 degrees F, before the coating process is begun; this temperature shall be maintained during the printing process.

- b. The thermal oxidizer shall be equipped with continuous temperature indicators and strip chart recorders for the afterburner combustion chamber temperatures.
- 5. Total VOM, HAPs and single HAP usage from the source, including clean-up operations, shall not exceed the following limits:

Total VOM		Combined HAPs		Single HAP	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
20	250	20	250	8	100

- 6a. Total VOM emissions from the source, including clean-up operations shall not exceed the following limits:

Total VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
1.0	12.5

- b. Total single and combined HAP emissions from the source, including clean-up operations shall not exceed the following limits:

Single HAP Emissions		Combined HAPs Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
0.4	5	1.0	12.5

These limits define the maximum emissions of the three vinyl coating presses and are based on actual emissions determined from maximum material usages, volatile organic material contents and thermal oxidizer overall control efficiency of 95%. 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.

- 7a. 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 vinyl coating 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.
- 8. Within 90 days of a written request from the Illinois EPA the volatile organic emissions of the thermal oxidizer controlling the 3 vinyl coating offset printing presses shall be measured by an approved

testing service, during conditions which are representative of maximum emissions.

9. 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 25

10. These tests shall be performed to show that the thermal oxidizer system reduces VOM emissions from the dryers by 90% and has an overall control efficiency greater than 85% in order to demonstrate compliance with 35 Ill. Adm. Code 218.207(b) and NSPS, Subpart FFF, 40 CFR 60.582(a)(2).
11. 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 Agency to witness these tests.
12. Copies of Final Report(s) for the tests shall be submitted to the Illinois EPA within fourteen (14) days after the test results are compiled and finalized.
13. 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.
14. 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
9511 West Harrison
Des Plaines, Illinois 60016
- Illinois Environmental Protection Agency
Attn: Source Emission Test Specialist
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016
15. The Permittee shall maintain monthly records of the following items:
- a. Monthly and annual usage of all materials.
 - b. VOM contents of the materials used.
 - c. VOM emissions per month and per year.
 - d. Natural gas usage (10^6 scf/month and 10^6 scf/year).
 - e. Control device monitoring equipment.
 - f. Log of operating time for the control device, monitoring equipment and the associated printing lines.
 - g. 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.
16. 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.

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

20. Persons with lifetime operating permits must obtain a revised permit for any of the following changes at the source:
 - a. An increase in emissions above the amount the emission unit or the source is permitted to emit;
 - b. A modification;
 - c. A change in operations that will result in the source's noncompliance with conditions in the existing permit; or
 - d. A change in ownership, company name, or address, so that the application or existing permit is no longer accurate.

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

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

DES:RBS:jar

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