

217/782-2113

"RENEWAL"  
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

CFC International, Inc.  
Attn: Mr. William Herring  
500 State Street  
Chicago Heights, Illinois 60411

I.D. No.: 031045AGI  
Application No.: 95120155

Date Received: January 25, 2005  
Date Issued: December 13, 2007  
Expiration Date<sup>1</sup>: December 13, 2012

Operation of: Coating Production and Printing  
Source Location: 500 State Street, Chicago Heights, Cook County, 60411  
Responsible Official: William A. Herring, Senior Vice President

This permit is hereby granted to the above-designated Permittee to OPERATE a coating production and printing source, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact David Hulskotter at 217/782-2113.

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

ECB:DWH:psj

cc: Illinois EPA, FOS, Region 1  
CES  
Lotus Notes

<sup>1</sup> Except as provided in Conditions 1.5 and 8.7 of this permit.

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**1.0 INTRODUCTION**

1.1 Source Identification

CFC International, Inc.  
500 State Street  
Chicago Heights, Illinois 60411  
708/891-3456

I.D. No.: 031045AGI  
County: Cook  
Standard Industrial Classification: 2295, Coated Fabrics, Not  
Rubberized

1.2 Owner/Parent Company

CFC International, Inc.  
500 State Street  
Chicago Heights, Illinois 60411

1.3 Operator

CFC International, Inc.  
500 State Street  
Chicago Heights, Illinois 60411

Operator Contact: Mr. William Herring  
Contact Phone: 708/891-3456

1.4 Source Description

The source is a coated products manufacturer, specifically, CFC produces hot stamp foils, including metallic foils in colors, bright and brushed tones, wood grain foils and pigmented foils. CFC also produces magnetic ink character recognition ribbons, multi-strike and computer printing film, correction lift-off tape and a line of products for the credit card and security industry. Mixing, blending and coating operations are used to produce these products. Primary emissions from the source are VOM and HAPs from the use of solvents and thinners.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM), and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this

permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

- a. This permit contains "Title I conditions" that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."

**2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED**

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BACT	Best Available Control Technology
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO <sub>2</sub>	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

### 3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Storage Tanks 2, 6, 7, and 8  
Wash Solvent Tank  
Solvent Distillation and Recovery System  
Dirty Solvent Tank  
Hot Pot

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Storage Tanks 1, 3, 4, and 5  
Drum Washer  
Vat Washer  
Web Slitters  
Metallizer  
Holographic Imagers  
Air Compressors  
R&D Pilot Coaters

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

### 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 218.301, which requires that organic material emissions not exceed 8.0 pounds per hour, if no odor nuisance exists, or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.
- 3.2.4 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 218.182.
- 3.2.5 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia at 70°F, the Permittee shall comply with the applicable requirements of 35 IAC 218.122, which requires use of a permanent submerged loading pipe, submerged fill, or a vapor recovery system.

### 3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Milling Operations (3-Ball and 3-Horizontal Mills), Mixing and Blending Operations (1-Mixing Tank and 7-Vat Stands), and Coating Mixing and Blending Operations (2-Kady Mills and 2-Sand Mills)	3-Horizontal Mills-6/96 Other Units - 12/81	Baghouse BH1 Controls 3-Ball and 3-Horizontal Mills, 1-Mixing Tank and 7-Vat Stands Dust Collector DC1 Controls 2 Kady Mills and 2-Sand Mills
02	Coating Units (12 Flexographic Presses CU1-CU12) and (3 Rotogravure Presses RG1, RG2, and RG3)	CU1-CU12 in 12/81, RG1-12/81, RG2-6/93, and RG3-2/97	2 Regenerative Thermal Oxidizers
03	Non-Heatset Lithographic Printing Press No. 1 4 Ink Jet Printers IJPP-1, 2, 3 and 4	01/2007 01/2007	None None
04	2 Flexographic Printing Presses #1 and #2 2 Intaglio Printing Presses #1 and #2	01/2007 01/2007	None None
05	Sheet Laminating Machine (LAM1)	2006	None

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Applicability of Clean Air Act Permit Program (CAAPP)

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

### 5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for ozone and PM<sub>2.5</sub> and attainment or unclassifiable for all other criteria pollutants (CO, lead, NO<sub>2</sub>, PM<sub>10</sub> and SO<sub>2</sub>).

### 5.3 Source-Wide Applicable Provisions and Regulations

5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.

5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. Pursuant to 35 IAC 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 the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

#### 5.3.3 Fugitive Particulate Matter Operating Program

- a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)]. The Permittee shall comply with the fugitive particulate matter operating program, submitted to the Illinois EPA and incorporated by reference into this permit, and any amendments to the program submitted pursuant to paragraph b below.
- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current.

Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

- c. All normal traffic pattern roads and parking facilities located at this source 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 [35 IAC 212.306].

#### 5.3.4 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

#### 5.3.5 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

#### 5.3.6 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the

applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).

- b. This permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

#### 5.3.7 Episode Action Plan

- a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144 and is incorporated by reference into this permit.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared by the Director of the Illinois EPA or his or her designated representative.
- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.
- d. Any subsequent revisions of the plan shall also be sent to the Cook County Department of Environmental Control.

#### 5.4 Source-Wide Non-Applicability of Regulations of Concern

Source-wide non-applicability of regulations of concern are not set for this source. However, there may be unit specific non-applicability of regulations of concern set forth in Section 7 of this permit.

#### 5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there may be requirements for unit specific

control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	119.94
Sulfur Dioxide (SO <sub>2</sub> )	0.15
Particulate Matter (PM)	5.76
Nitrogen Oxides (NO <sub>x</sub> )	42.16
HAP, not included in VOM or PM	-----
Total	168.01

5.6.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.6.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, state rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, 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:

- a. 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. 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 [35 IAC 201.282(a)].

- b. 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 [35 IAC 201.282(b)].
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

#### 5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there may be provisions for unit specific monitoring set forth in Section 7 of this permit.

#### 5.9 Source-Wide Recordkeeping Requirements

##### 5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

##### 5.9.2 Records for Source-Wide Control Requirements and Work Practices

- a. The Permittee shall keep copy of the fugitive particulate matter operating plan, and any amendments to the plan, as required by Condition 5.3. The Permittee shall also keep a record of activities completed according to the plan.

##### 5.9.3 Records for HAP Emissions

The Permittee shall maintain records of HAP emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit, pursuant to Section 39.5(7)(b) of the Act.

#### 5.9.4 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

#### 5.10 Source-Wide Reporting Requirements

##### 5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

##### 5.10.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information, including HAP emissions, for the previous calendar year.

#### 5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source. However, there may be provisions for unit specific operational flexibility set forth in Section 7 of this permit.

#### 5.12 Source-Wide Compliance Procedures

##### 5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed by the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

## 6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

### 6.1.1 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 CAA.

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' CAAPP 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 IAC 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 IAC 205.500 and 35 IAC 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 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

### 6.1.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.1.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.1.8, 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 6.1.5.
  - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
  - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.1.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC 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 in Section 7.0 of this permit.

6.1.4 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 IAC 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 IAC 205.610(b).

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

#### 6.1.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.1.3, 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 IAC 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.

#### 6.1.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 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 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 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 IAC 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.

#### 6.1.7 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 IAC 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 IAC 205.337;
  - iv. If a source has experienced an emergency, as provided in 35 IAC 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 IAC 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 IAC 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 IAC 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 November 30 of each year, for the preceding seasonal allotment period.

6.1.8 Allotment of ATUs to the Source

- a.
  - i. The allotment of ATUs to this source is 187 ATUs per seasonal allotment period.
  - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 19 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 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.1.10 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 6.1.3(a) 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 IAC Part 205, including:
  - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
  - ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and
  - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.1.9 Recordkeeping for ERMS

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

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.1.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.1.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
  - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
  - 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 IAC 205.405(a) and (c)]:

None

- 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 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 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 IAC 205.405(b) and (c)]:

Flexographic Presses CU1 - CU12  
Rotogravure Presses RG1 - RG3

**7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS**

7.1 Milling, Mixing, and Blending Operations

7.1.1 Description

01 - CFC International Utilizes mills, vat stands, and a mixing tank to process solids and solvents to produce inks and coatings.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Milling Operations (3-Ball and 3-Horizontal Mills), Mixing and Blending Operations (1-Mixing Tank and 7-Vat Stands), and Coating Mixing and Blending Operations (2 Kady Mills and 2-Sand Mills)	3-Horizontal Mill - 6/96  Other Units - 12/81	Baghouse BH1 Controls 3-Ball and 3-Horizontal Mills, 1-Mixing Tank and 7-Vat Stands  Dust Collector DC1 Controls 2 Kady Mills and 2-Sand Mills

7.1.3 Applicable Provisions and Regulations

- a. The "affected paint manufacturing operations" for the purpose of these unit-specific conditions, are described in Conditions 7.1.1 and 7.1.2.
- b. The affected paint manufacturing operations are subject to 35 IAC 218, Subpart AA: Paint and Ink Manufacturing, because it has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate. These requirements are described in Condition 7.1.5.
- c. The affected paint manufacturing operations are subject to 35 IAC Section 218.301, which provides that no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, with the following exception: if no odor nuisance exists the limitation shall apply only to photochemically reactive material.
- d. Affected paint manufacturing operations are subject to 35 IAC 212.321(a), which provides that:
  - i. 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, 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 subsection (c) of 35 IAC 212.321 (see also Attachment 2) [35 IAC 212.321(a)].

7.1.4 Non-Applicability of Regulations of Concern

The National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart HHHHH Miscellaneous Coating Manufacturing does not apply to the affected paint manufacturing operations because the source is already subject to another subpart under 40 CFR Part 63 (40 CFR 63 Subpart KK and 63.7985(d) (2)) [40 CFR 63.7985(a) (4)].

7.1.5 Control Requirements and Work Practices

a. The Permittee shall follow good operating practices for the fabric filter dust collectors, including periodic inspection, routine maintenance and prompt repair of defects.

b. Pursuant to 35 IAC Part 218, Subpart AA, the Permittee shall comply with the following requirements, these requirements are also established in Construction Permit 96060039:

i. Open-top mills, tanks, vats or vessels

A. The mill, tank, vat or vessel is equipped with a cover which completely covers the mill, tank, vat or vessel opening except for an opening no larger than necessary to allow for safe clearance for a mixer shaft. Such cover shall extend at least 1.27 cm (0.5 in) beyond the outer rim of the opening or be attached to the rim.

B. The cover remains closed except when production, sampling, maintenance or inspection procedures require access.

C. The cover is maintained in good condition such that, when in place, it maintains contact with the rim of the opening for at least 90 percent of the circumference of the rim [35 IAC 218.624].

ii. Grinding mills

A. No person shall operate a grinding mill for the production of paint or ink which is not

maintained in accordance with the manufacturer's specifications.

- B. No person shall operate a grinding mill fabricated or modified after the effective date of this Subpart which is not equipped with fully enclosed screens.
- C. The manufacturer's specifications shall be kept on file at the plant by the owner or operator of the grinding mill and be made available to any person upon verbal or written request during business hours [35 IAC 218.625].

iii. Storage Tanks

- A. The owner or operator shall equip tanks storing VOL with a vapor pressure greater than 10 kPa (1.5 psi) at 20°C (68°F) with pressure/vacuum conservation vents set as a minimum at  $\pm 0.2$  kPa (0.029 psi). These controls shall be operated at all times. An alternative air pollution control system may be used if it results in a greater emission reduction than these controls. Any alternative control system can be allowed only if approved by the Illinois EPA and approved by the USEPA as a SIP revision.
- B. Stationary VOL storage containers with a capacity greater than 946 l (250 gal) shall be equipped with a submerged-fill pipe or bottom fill. These controls shall be operated at all times. An alternative control system can be allowed only if approved by the Illinois EPA and approved by the USEPA as a SIP revision [35 IAC 218.626].

iv. Leaks

- A. Each pump shall be checked by visual inspection each calendar week for indications of leaks, that is, liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, the pump shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.
- B. Any pump, valve, pressure relief valve, sampling connection, open-ended valve and flange or connector containing a fluid which is at least 10 percent VOM by weight which appears to be leaking on the basis of sight, smell or sound shall be repaired as soon as practicable,

but no later than 15 calendar days after the leak is detected.

- C. A weather proof, readily visible tag, in bright colors such as red or yellow, bearing an identification number and the date on which the leak was detected shall be attached to leaking equipment. The tag may be removed upon repair, that is, when the equipment is adjusted or otherwise altered to allow operation without leaking.
- D. When a leak is detected, the owner or operator shall record the date of detection and repair and the record shall be retained at the source for at least two years from the date of each detection or each repair attempt. The record shall be made available to any person upon verbal or written request during business hours [35 IAC 218.628].

v. Clean Up

- A. No person shall clean paint or ink manufacturing equipment with organic solvent unless the equipment being cleaned is completely covered or enclosed except for an opening no larger than necessary to allow safe clearance for proper operation of the cleaning equipment, considering the method and materials being used.
- B. No person shall store organic wash solvent in other than closed containers, unless closed containers are demonstrated to be a safety hazard, or dispose of organic wash solvent in a manner such that more than 20 percent by weight is allowed to evaporate into the atmosphere [35 IAC 218.630].

7.1.6 Production and Emission Limitations

Production and emission limitations are not set for the affected paint manufacturing operations. However, there are source-wide production and emission limitations set forth in Condition 5.6.

7.1.7 Testing Requirements

Testing requirements are not set for the affected paint manufacturing operations. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.1.8 Monitoring Requirements

Monitoring requirements are not set for the affected paint manufacturing operations. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected paint manufacturing operations to demonstrate compliance with Conditions 5.6.1 and 7.1.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Product solvent usage, ton/mo and ton/yr;
- b. Clean-up solvent usage, ton/mo and ton/yr;
- c. Operating hours of each affected paint manufacturing operation, hr/mo;
- d. Total VOM and HAP emissions calculated based on the compliance procedures in Condition 7.1.12;
- e. Solid material handled (e.g., pigment), ton/mo and ton/yr; and
- f. Total PM emissions calculated based on the compliance procedures in Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected paint manufacturing operations with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Notification within 30 days following the occurrence of a violation of the affected paint manufacturing operations with the conditions of this section with a copy of such record for each incident.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected paint manufacturing operations. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.1.12 Compliance Procedures

Compliance with the emission limits in Conditions 5.6.1 and 7.1.3 shall be based on the recordkeeping requirements in Condition 7.1.9 and the formulas listed below:

- a. Compliance with Condition 7.1.3(d) is assumed to be achieved by proper operation of the fabric filter dust collectors, as addressed by Condition 7.1.5(a).
- b. To determine compliance with the Conditions 5.6.1 and 7.1.3(d), PM emissions from the affected paint manufacturing operations shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factors (lb/Ton Pigment)</u>
PM	20

This is the uncontrolled emission factor for paint manufacturing, Table 6.4-1, AP-42, Volume I, Fifth Edition, January, 1995.

PM Emissions (lb) = (Pigment Usage, Ton) x (The Appropriate Emission Factor, lb/Ton) x [1 - Fabric Filter Dust Collector Efficiency\* in %/100]

\*As specified by manufacturer or vendor of the fabric filter dust collectors

- c. To determine compliance with the Conditions 5.6.1 and 7.1.3(c), VOM and HAP emissions from representative recipes and compositions from each group of formulations of paint manufactured using the affected paint manufacturing operations shall be calculated based as follows:

- i. VOM and HAP emissions from the addition of materials to mixers, grinding equipment, and thin down tanks using Raoult's Law and the Ideal Gas Law:

$$E_{VOM} = \sum (P_i * x V_i * MW_i) / (R * T)$$

Where:

$E_{VOM}$  = Total VOM (or HAP) loading emissions (lb/yr);

$P_i$  = Pure component vapor pressure of component I within the vessel headspace at temperature T (psia);

$V_i$  = Volume of vapor displaced, equal to total annual solvent i usage (gallons);

$MW_i$  = Vapor molecular weight of component i (lb/lb-mole);  
 $R$  = Ideal gas constant (144.864 psia-gal/lb mol-K); and  
 $T$  = Temperature (K).

- ii. Heat-up losses that occur during the operation of high-speed dispersers, bead and ball mills, and similar types of dispersing equipment shall be calculated as follows, based on the Ideal Gas Law:

$$E_{VOM} = \sum \{ [(P_i^*)_{T1}/Pa_1 + (P_i^*)_{T2}/Pa_2] \times [Pa_1/T1 - Pa_2/T2] \times V_i \times MW_i \} / 2R$$

Where:

$E_{VOM}$  = VOM (or HAP) Emissions from material heat-up in the process equipment (lb/yr);  
 $(P_i^*)_{T1}$  = Vapor pressure of pure solvent i at initial temperature T1 (psia);  
 $(P_i^*)_{T2}$  = Vapor pressure of pure solvent i at final temperature T2 (psia);  
 $Pa_1$  = 14.696 -  $(P_i^*)_{T1}$ ;  
 $Pa_2$  = 14.696 -  $(P_i^*)_{T2}$ ;  
 $T1$  = Initial temperature (K);  
 $T2$  = Final temperature (K);  
 $V_i$  = Volume of annual solvent i usage (gallons);  
 $MW_i$  = Vapor molecular weight of component i (lb/lb-mole); and  
 $R$  = Ideal gas constant (144.864 psia-gal/lb mol-K).

- iii. Wash solvent emissions shall be calculated as follows:

$$E_{VOM} = 0.02 \times V \times \rho$$

Where:

$E_{VOM}$  = VOM (or HAP) Emissions of wash solvent (lb/yr);

V = Volume of annual wash solvent usage  
(gallons); and

$\rho$  = Average density of wash solvent (lb/gal).

- iv. Total VOM (or HAP) emissions from the mixing and blending area are found by adding the emissions calculated in Conditions 7.1.12(c) (i) through (iii).

7.2 Unite 02 - Flexographic and Rotogravure Presses Controlled by Thermal Oxidizers

7.2.1 Description

02 - Reverse roll, flexographic and rotogravure presses are used to apply water-based and solvent based inks and coatings on paper, foil, composite materials. The printing/coating is a continuous process performed on roll stock. Each press has a gas fired dryer to dry the inks and coatings. VOM and HAP(s) emissions result from the use of solvent based materials. Fuel combustion emissions results from the use of natural gas in the dryers.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
02	Coating Units (12 Flexographic Presses CU1-CU12) and (3 Rotogravure Presses RG1, RG2, and RG3)	CU1-CU12 in 12/81, RG1 - 12/81, RG2 - 6/93, and RG3 - 2/97	2 Regenerative Thermal Oxidizers

7.2.3 Applicable Provisions and Regulations

- a. The "affected printing lines" for the purpose of these unit-specific conditions, are described in Conditions 7.2.1 and 7.2.2.
- b. Each affected printing line is subject to 35 IAC 218.401(c) (2), (c) (4), (c) (5), and (c) (6), which provides that; no owner or operator of a subject printing line equipped with a capture system and control device shall operate the subject printing line unless:
  - i. An incineration system is used which reduces the captured VOM emissions by at least 90 percent by weight; and
  - ii. The printing line is equipped with a capture system and control device that provides an overall reduction in VOM emissions of at least:
    - A. 75 percent where a publication rotogravure printing line is employed, or
    - B. 65 percent where a packaging rotogravure printing line is employed, or
    - C. 60 percent where a flexographic printing line is employed; and

- iii. The capture system and control device are operated at all times when the subject printing line is in operation. The owner or operator shall demonstrate compliance with this subsection by using the applicable capture system and control device test methods and procedures specified in 35 IAC Section 218.105(c) through Section 218.105(f) and by complying with the recordkeeping and reporting requirements specified in 35 IAC Section 218.404(e).
  - c. The affected printing lines are subject to 35 IAC 212.321(a), which provides that:
    - i. 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, 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 subsection (c) of 35 IAC 212.321 (see also Attachment 2) [35 IAC 212.321(a)].
  - d. Each product and packaging rotogravure or wide-web flexographic printing affected source is subject to 40 CFR 63 Subpart KK, National Emission Standards for the Printing and Publishing Industry. The owner or operator shall limit emissions to no more than five percent of the organic HAP applied for the month. The owner or operator of each product and packaging rotogravure or wide-web flexographic printing affected source shall demonstrate compliance with this standard by following the procedures below: [40 CFR 63.825(b)]
    - i. Operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95 percent for each month. The owner or operator shall demonstrate compliance in accordance with the procedure in 40 CFR 63.825(b)(7) and the methodology when emissions are controlled by an oxidizer. [40 CFR 63.825(b)(7)]

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected printing lines are not subject to 35 IAC 218.204(c), Coating Operations - Paper Coating, as the paper coating limitation does not apply to a line on which printing is performed which complies with the emission limitations in 35 IAC 218.401 [35 IAC 218.204(c)].
- b. This permit is issued based on the affected printing presses not being subject to 40 CFR 60, Subpart QQ - Standards of Performance for the Graphics Art Industry:

Publication Rotogravure Printing, because the affected printing presses that are rotogravure units are not used as publication rotogravure printing presses, specifically the units do not produce the products listed as products produced by a publication rotogravure printing press, as defined in 40 CFR 60.431 - Definitions and notations.

- c. The affected printing lines are not subject to 35 IAC 218 Subpart G (35 IAC 218.301 or 218.302), as the subpart does not apply to a line which complies with 35 IAC 218 Subpart H [35 IAC 218.402(b)].
- d. This permit is issued based on the affected printing lines not being subject to 40 CFR 63, Subpart EE, National Emission Standards for Magnetic Tape Manufacturing Operations, because the affected printing lines produce less than 1% magnetic tape [40 CFR 63.701(b)(2)].
- e. The affected printing lines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected printing lines are subject to 40 CFR 63, Subpart KK proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).
- f. This permit is issued based on the affected printing presses not being subject to 40 CFR 60, Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing, because the affected printing presses are not used to coat flexible vinyl or urethane products which excludes flexible packaging.
- g. This permit is issued based on the affected printing presses not being subject to 40 CFR 60, Subpart SSS - Standards of Performance for Magnetic Tape Coating and Printing, because the affected printing presses used to produce magnetic tape were not constructed, modified, or reconstructed after January 22, 1986.

#### 7.2.5 Control Requirements and Work Practices

- a. Pursuant to 35 IAC 218.401(c)(5), the control device shall be equipped with the applicable monitoring equipment as specified in Section 7.2.8(b), calibrated, operated and maintained according to vendor specifications at all times the control device is in use.
- b. Pursuant to 35 IAC 218.401(c)(6), the capture system and control device are operated at all times when an affected printing line is in operation.
- c. Natural gas shall be the only fuel fired in the press dryer(s) of each affected printing line.

- d. Notwithstanding 35 IAC 218.107, seasonal shutdown of the oxidizers is not permitted. The above limitations were established in Construction Permit 96120080 pursuant to 35 IAC 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 IAC Part 203. [T1]
- e. The capture system for each affected printing line shall be maintained and operated to meet a Permanent Total Enclosure (PTE) with a 100% capture efficiency, as defined by 35 IAC 218, Appendix B, Procedure T, and a 98% overall VOM destruction efficiency, as specified in Construction Permits 93050027 and 96110078 and Operating Permit 81120064. [T1]
- f. This permit is issued based on the affected printing presses constructed, modified, or reconstructed after January 22, 1986 not being used to produce magnetic tape products, specifically affected printing presses RG2 and RG3 shall not be used to produce or process portion of magnetic tape.
- g. The RTO's shall be operated to achieve at least 98 percent overall control efficiency for VOM.

The above limitations were established in Permit 03080041, pursuant to 35 IAC 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 CAA, specifically 35 IAC Part 203 [T1].

- h. This permit is issued based on the affected printing presses not being used as publication rotogravure printing presses, specifically the units shall not produce the products listed as products produced by a publication rotogravure printing press, as defined in 40 CFR 60.431 - Definitions and Notations.

7.2.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source wide emission limitations in Condition 5.6, the affected printing lines are subject to the following:

- a. VOM material usage and the emissions of VOM shall not exceed the following limits:

<u>Affected Printing Line</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(ton/mo)</u>	<u>(ton/yr)</u>	<u>(ton/mo)</u>	<u>(ton/yr)</u>
CU1-CU12	357.4	4,208.10	7.15	84.18
RG2	44.4	438.00	8.80	8.75

<u>Affected Printing Line</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(ton/mo)</u>	<u>(ton/yr)</u>	<u>(ton/mo)</u>	<u>(ton/yr)</u>
RG3	65.8	775.30	1.32	15.51
RG2 & RG3 Total	124.0	1,240.00	2.50	24.80

These limits are based upon the maximum VOM usage, the overall control efficiency required per unit in condition 7.2.5, and the maximum year round operating hours of 8,760 hr/yr per unit.

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 (running 12 month total).

The above limitations were established in Permits 95120155 and 93050027, pursuant to 35 IAC 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 CAA, specifically 35 IAC Part 203. [T1]

- b. Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
RG1	24	283	0.5	5.66

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 (running 12 month total).

The above limitations were established in Permit 03080041, pursuant to 34 IAC 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 CAA, specifically, 35 IAC Part 203 [T1].

- c. Emissions from the two RTO's (both combined) attributable to combustion in the process units and thermal oxidizers shall not exceed the following limits:

<u>Pollutant</u>	<u>(Lb/Hour)</u>	<u>Emissions (Tons/Year)</u>
NO <sub>x</sub>	9.63	42.2
CO	7.09	31.1

Compliance with lb/hour emission limits shall be determined based on a 3-hour average emission rate.

The source has addressed the applicability and compliance of 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The provisions in this permit are intended to ensure that the modification addressed in this permit does not constitute a major modification pursuant to these rules. In particular, the source is not a major source for purposes of PSD, i.e., emissions of NO<sub>x</sub> from the source are less than 250 tons per year [T1].

7.2.7 Testing Requirements

The Permittee shall comply with the applicable testing requirements of 40 CFR 63.827.

7.2.8 Monitoring Requirements

a. The Permittee shall comply with the applicable monitoring requirements of 40 CFR 63.828, including the following:

i. For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of  $\pm 1$  percent of the temperature being monitored in °C or  $\pm 1^\circ\text{C}$ , whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

b. The regenerative thermal oxidizer shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the thermal oxidizer combustion chamber temperature [35 IAC 218.105(d) (2) and 218.401(c) (5)].

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected paint manufacturing operations to demonstrate compliance with Conditions 5.6.1 and 7.2.3, pursuant to Section 39.5(7) (b) of the Act:

a. Each affected printing line is subject to recordkeeping requirements of 35 IAC 218.404(e) (2), which provides that:

i. The owner or operator of a printing line subject to the limitations of 35 IAC Section 218.401 and complying by means of 35 IAC Section 218.401(c) shall collect and record all of the following information each day for each printing line and maintain the information at the source:

- A. Control device monitoring data.
  - B. A log of operating time for the capture system, control device, monitoring equipment and the associated printing line.
  - C. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- b. The owner or operator of an affected printing line shall collect and record all of the following information for each printing line and maintain the information at the source:
- i. The name and identification number of each VOM/HAP containing material used.
  - ii. The VOM and HAP content (wt %) of each VOM/HAP containing material used.
  - iii. Usage of each VOM/HAP containing material (lb/mo).
  - iv. The actual overall VOM and HAP control efficiency of the device(s) controlling each line. (% VOM or HAP controlled). The actual overall VOM and HAP control efficiency shall be determined based on the most recent Illinois EPA approved stack test data.
  - v. Operating hours of each affected printing line. (hr/mo)
  - vi. VOM and HAP emissions from affected printing lines CU1-CU12 calculated in accordance with the procedures given in Condition 7.2.12 (lb/hr and ton/yr).
  - vii. VOM and HAP emissions from each affected printing line RG1, RG2, and RG3 calculated in accordance with the procedures given in Condition 7.2.12 (lb/hr and ton/yr).
- c. The owner or operator of an affected printing line shall collect and record all of the following information for the printing line dryers and control devices and maintain the information at the source:
- i. Fuel usage (mmscf/yr).
  - ii. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.2.12 (ton/yr).

d. Test Results.

7.2.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected paint manufacturing operations with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.
- b. Each affected printing line is subject to reporting requirements of 35 IAC 218.404(e)(3), which provides that:
  - i. 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 IAC 218.401(c), 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 IAC Section 218.401 from 35 IAC Section 218.401(c) to 35 IAC Section 218.401(a) or (b), the owner or operator shall comply with all requirements of 35 IAC 218.404(c)(1) or (d)(1), respectively. Upon changing the method of compliance with 35 IAC Section 218.401 from 35 IAC Section 218.401(c) to 35 IAC Section 218.401(a) or (b), the owner or operator shall comply with all requirements of 35 IAC 218.404(c) or (d), respectively.
    - C. Any record showing violation of the operating and control requirements of condition 7.2.5 and emission limitations of condition 7.2.6, shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
- c. The Permittee shall comply with the applicable reporting requirements of 40 CFR 63.830, including the following:
  - i. A Notification of Compliance Status specified in 40 CFR 63.9(h).
  - ii. A summary report specified in 40 CFR 63.10(e)(3) of this part shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to

a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i), the summary report shall include, as applicable:

- A. Exceedances of the standards in 40 CFR 63.24 - 63.825.
- B. Exceedances of either of the criteria of 40 CFR 63.820(a)(2).
- C. Exceedances of the criterion of 40 CFR 63.821(b)(1) and the criterion of 40 CFR 63.821(b)(2) in the same month.
- D. Exceedances of the criterion of 40 CFR 63.821(a)(2)(ii)(A).

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected printing lines. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3(b) shall be determined based upon testing required by Condition 7.2.7.
- b. Compliance with Condition 7.2.3(c) is assumed to be inherent in operation of the printing lines, so that no compliance procedures are set in this permit addressing these regulations.
- c. i. Compliance with Conditions 5.6 and 7.2.6 for each affected printing line or a group of printing lines (i.e., CU1-CU12) shall be determined based upon the recordkeeping requirements of Condition 7.2.9 and the formula(s) given below:

$$E_v = \sum_{i=1}^n C_i W_i (1 - D_v)$$

Where:

- v = Printing Line Identification
- n = The total number of VOM/HAP containing materials applied on line v
- E<sub>v</sub> = Total VOM (or HAP) emissions from line v
- C<sub>i</sub> = Quantity of VOM/HAP containing material used on line v each month (lb/mo)

$W_i$  = VOM (or HAP) content of VOM/HAP containing material applied on line v each month (wt. % VOM)  
 $D_v$  = Actual overall control efficiency of the device(s) controlling line v

- ii. Compliance with the hourly limit as defined in Condition 7.2.6 shall be determined by dividing the monthly individual unit VOM emission or monthly group emissions by the individual unit or group operating hour.
- iii. Compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
- d. Compliance with Condition 5.6.1 for the affected printing line dryers and control devices fuel combustion emissions shall be based on the recordkeeping requirements in Condition 7.2.9 and the emissions factors and formulas listed below:

Table 1. For natural gas fired units with firing rate of less than 100 mmBtu/hr.

Pollutant <u>Type</u>	Emission Factor <u>(lb/mmscf)</u>
NO <sub>x</sub>	100
VOM	5.5
PM	7.6
SO <sub>2</sub>	0.6

Emission factors are based on the maximum firing rate of an individual units and Tables 1.4-1, and 1.4-2, AP-42, Fifth Edition, Volume 1, Supplement D, March 1998.

Emission (ton) = Natural Gas Usage (mmscf) x The Applicable Emission Factor (lb/mmscf) x Conversion Factor (ton/2000 lb)

7.3 Unite 03 - Miscellaneous Printing Presses

7.3.1 Description

A non-heatset lithographic printing press and ink jet printers will also be used for specialty printing.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
03	Non-Heatset Lithographic Printing Press No. 1	01/2007	None
	4 Ink Jet Printers (IJPP-1, 2, 3 and 4)	01/2007	None

7.3.3 Applicable Provisions and Regulations

- a. The "affected printing lines" for the purpose of these unit-specific conditions, are each printing unit as described in Condition 7.3.2.
- b. The affected printing lines at the source are subject to 35 IAC 218.301 which requires that:  
  
The Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from the subject printing line. If no odor nuisance exists the limitation shall apply only to photochemically reactive material as defined in 35 IAC 211.4690.
- c. 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, 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 subsection (c) of 35 IAC 212.321 (see also Attachment 2) [35 IAC 212.321(a)].

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected printing lines are not subject to 35 IAC 218.407 through 218.410, "Emission Limitations and Control Requirements for Lithographic Printing Lines On and After March 15, 1996". This non-applicability is based on 35 IAC 218.405(d) (2), which excludes affected printing lines from limitations of 35 IAC 218.407 through 218.410 if the combined emissions of VOM from all lithographic printing line(s) never exceed 45.5 kg/day (100 lbs/day), as

determined in accordance with 35 IAC 218.411(a)(1)(B), before the application of capture systems and control devices.

- b. This permit is issued based on the affected ink jet lines not being subject to the control requirements of 35 IAC 218.986 because the VOM emissions of these lines, the affected lithographic line and other emission units whose VOM emissions contribute to applicability of these requirements (as set forth in 35 IAC 218.980), in total, are limited to below 25 tons per year.

7.3.5 Operational Limits and Work Practices

- a. The usage of ink and coatings for the affected lithographic line shall not exceed 0.70 tons/month and 5.5 tons/year.
- b.
  - i. The total usage of ink and make-up solution for the affected ink jet lines shall not exceed 0.54 tons/month and 4.38 tons/year.
  - ii. The total usage of clean-up solvent for the affected ink jet lines shall not exceed 0.21 tons/month and 1.68 tons/year.

7.3.6 Production and Emission Limitations

- a. The VOM emissions of the affected presses shall not exceed the following limitations. These limitations are based on the maximum usage of different materials on the presses as stated in the application.

Presses	Limitations	
	Tons/Month	Tons/Year
Lithographic Press	0.40	2.91
Ink Jet Presses	7.50	5.88

The above limitations were established in Permit 06060050, pursuant to 35 IAC 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 CAA, specifically 35 IAC Part 203. [T1]

7.3.7 Testing Requirements

- a. Upon request by the Illinois EPA, the Permittee shall have the VOM content of specific inks, coatings, fountain solutions and cleaning solutions used on the affected lines determined by the applicable test methods and procedures specified in 35 IAC 218.105(a).

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

- a. The Permittee shall maintain the following records for the affected lithographic line and any other lithographic printing lines at the source, pursuant to 35 IAC 218.411(a):
  - i. Standard recordkeeping:
    - A. The name and identification of each fountain solution additive, lithographic ink, and cleaning solvent used on the line(s), recorded each month;
    - B. A daily record which shows whether a line was in operation on that day;
    - C. The VOM content and the volume of each fountain solution additive, lithographic ink, and cleaning solvent, recorded each month;
    - D. The total VOM emissions each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month; and
    - E. The VOM emissions in lbs/day for the month, calculated in accordance with 35 IAC 218.411(a) (1) (B).
  - ii. Purchase and inventory recordkeeping:
    - A. The name, identification, and VOM content of each fountain solution additive, lithographic ink, and cleaning solvent used, recorded each month;
    - B. Inventory records from the beginning and end of each month indicating the total volume of each fountain solution additive, lithographic ink, and cleaning solvent used;
    - C. Monthly purchase records for each fountain solution additive, lithographic ink, and cleaning solvent used;
    - D. A daily record which shows whether a line was in operation on that day;



#### 7.3.10 Reporting Requirements

- a. The Permittee shall notify the Illinois EPA in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source ever exceed 45.5 kg/day (100 lbs/day), before control, within 30 days after the event occurs. Such notification shall include a copy of all records of such event.
- b. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected printing lines with the permit requirements within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

#### 7.3.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected printing lines. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

#### 7.3.12 Compliance Procedures

- a. Compliance provisions addressing particulate matter limitations in Condition 7.3.3(c) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of an affected printing line.
- b. Records of maximum process weight rate and VOM content of the material used shall be used to determine compliance with 35 IAC 218.301.
- c. VOM Emissions from the printing lines shall be calculated based on the recordkeeping requirements of Condition 7.1.9 and using the following calculation methodology:
  - i. The owner or operator may presume 95% retention of VOM in the substrate for non-heatset lithographic printing inks.
  - ii. For manual cleaning solution used on affected printing lines a 50% emission factor of the cleaning solution used may be presumed as stated in USEPA's Alternative Control Techniques Document Offset Lithographic Printing (EPA 453/R-94054, June 1994).
  - iii.  $VOM \text{ emissions from non-heatset ink} = \text{ink usage} \times VOM \text{ content} \times 0.05.$

- iv. VOM emissions from low vapor pressure (10 mmHg at 20°C) manual cleaning solution = manual VOM cleaning solution usage x VOM content x 0.5.
- v. VOM emissions from other materials = material usage x VOM content.

7.4 Unite 04 - Flexographic and Intaglio Printing Presses with No Control Device

7.4.1 Description

Flexographic and intaglio printing presses will be used to print security papers, assorted legal documents and other specialty printing. Emissions of volatile organic material (VOM) result from the organic solvents contained in inks, coating and cleaning materials used in the printing process. The VOM emissions of the presses are minimized as these presses are equipped to use UV-cure inks, which are cured with UV lights, rather than with a fuel fired oven. In addition, the presses are equipped to apply "VOM-free" glues, which contain essentially zero VOM. The flexographic presses operate on a 10 inch wide web. The NESHAP applies to flexographic presses capable of printing substrates greater than 18 inches.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
04	Flexographic Printing Presses #1 and 2 (FPP-1 and 2)	01/2007	None
	Intaglio Printing Presses #1 and 2 (IPP-1 and 2)	01/2007	None

7.4.3 Applicable Provisions and Regulations

- a. The "affected lines" for the purpose of these unit-specific conditions, are each printing unit as described in Conditions 7.4.1 and 7.4.2.
- b. i. Each affected line is subject to the requirements of 35 IAC Part 218, Subpart H: Printing and Publishing. For this purpose, each affected line shall comply with the standard of 35 IAC 218.401(a)(2), which requires that the VOM content of each coating and ink as applied not exceed twenty-five percent VOM by volume of the volatile content in the coating or ink.
- ii. As an alternative to complying with 35 IAC 218.401(a)(2), an affected line may comply with 35 IAC 218.402(b)(2), which requires that the VOM content of all coatings and inks as applied each day on the line, on a weighted average by volume, not exceed twenty-five percent VOM by volume of the volatile content in the coatings and inks, determined in accordance with 35 IAC 218.401(b)(2).

- c. Each affected line is subject to 35 IAC 212.321(a), which provides that 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 that, either alone or in combination with the emission of particulate matter from all other similar new or modified process emission units at a source, exceeds the allowable emission rates specified in 35 IAC 212.321(c) (see also Attachment 2) [35 IAC 212.321(a)].

#### 7.4.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on any coating applied on the affected lines not being subject to 35 IAC 218.204(c), Coating Operations - Paper Coating, as this standard does not apply to a line on which printing is performed that complies with the emission standard in 35 IAC 218.401.
- b. The affected lines are not subject to 35 IAC 218, Subpart G (35 IAC 218.301 or 218.302), as the rule does not apply to a printing line which complies with 35 IAC 218 Subpart H. [35 IAC 218.402(b)]
- c. The affected lines are not subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK, because the lines are not publication rotogravure, product and packaging rotogravure, or wide web flexographic presses.
- d. The affected intaglio printing lines are not subject to the New Source Performance Standards for Publication Rotogravure Printing, 40 CFR Subpart QQ, because this NSPS applies to presses fed from a continuous paper roll or web.
- e. This permit is issued based on all affected lines not being subject to Section 112(g) of the Clean Air Act, Hazardous Air Pollutants (HAPs), because the emissions of HAPs from each line are less than 10 tons/year for any single HAP and less than 25 tons/year for all HAPs, combined.

#### 7.4.5 Operational Limits and Work Practices

- a. The total usage of inks, coatings and other VOM containing materials on the affected lines, not including UV-cure materials and "VOM-free" glue, which generate minimal VOM emissions, and cleanup solvent, shall not exceed 2.2 tons/month and 22.2 tons/year.
- b. The total usage of cleanup solvent on the affected lines shall not exceed 1.00 tons/month and 7.00 tons/year.
- c. Compliance with these annual limitations and other annual limitations in this Section shall be determined by adding

data from the present month to the data for the preceding 11 months (total 12 months of data).

7.4.6 Emission Limitations

- a. The VOM emissions of the affected presses shall not exceed 1.1 tons/month and 8.4 tons/year.
- b. The above limitations were established in Permit 06060050, pursuant to 35 IAC 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 CAA, specifically 35 IAC Part 203. [T1]

7.4.7 Testing Requirements

- a. Upon request by the Illinois EPA, the VOM content of representative samples of inks, coatings, and solvents used on the affected lines determined by the applicable test methods and procedures specified in 35 IAC 218.105(a). [35 IAC 218.401(a)]
- b. The VOM content of materials determined by the applicable test methods and procedures specified in 35 IAC 218.105 shall take precedence over the VOM content of materials determined by other means, as provided by 35 IAC 105(a)(2)(A) or (B).

7.4.8 Monitoring Requirements

Monitoring requirements are not set for the affected printing lines. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.4.9 Recordkeeping Requirements

- a. i. The Permittee shall maintain the following records for each affected line on a daily basis pursuant to 35 IAC 218.404(c)(2), as it is complying by means of 35 IAC 218.401(a):
  - A. The name and identification of each ink and coating as applied.
  - B. The VOM content of each ink and coating as applied.
- ii. If the Permittee elects to comply by means of 35 IAC 218.404(b)(2) for an affected line, the Permittee shall keep the records specified by 35 IAC 218.404(d)(2) on a daily basis for the line.

- b. The Permittee shall maintain the following records related to operation and VOM emissions of the affected lines:
  - i. A file containing the current data for the VOM content (weight percent) for each ink, coating and solvent used on the affected lines, with supporting documentation.
  - ii. The amount of each coating, solvent or other VOM containing material delivered to the affected lines, other than UV-cure materials and VOM free glues, (pounds/month).
  - iii. If the Permittee elects to account for the VOM contained in used material that is recovered and sent off-site:
    - A. The amount of VOM containing material recovered from the affected lines, by shipment (pounds, with date and type of shipment, if applicable).
    - B. The VOM content of each shipment of such material (pounds), with supporting documentation.
  - Note: Credit for recovered material shall be taken in the month in which such collected material is actually sent off-site.
  - iv. The usage of inks, coatings and other VOM containing materials on the affected lines, other than UV-cure materials and cleanup solvent (tons/month and tons/year), with supporting calculations.
  - v. The usage of cleanup solvent on the affected lines (tons/month and tons/year), with supporting calculations.
  - vi. The emissions of VOM from the affected lines, based upon the above records (tons/month and tons/year), with supporting calculations.

#### 7.4.10 Reporting Requirements

- a. Upon initial start-up of each affected line, the Permittee shall certify to the Illinois EPA that the line will comply with 35 IAC 218.401(a) or (b), which certification shall include the information specified by 218.404(c)(1) or (d)(1), respectively.
- b. The Permittee shall notify the Illinois EPA in the following circumstances:

- i. Any record showing violation of 35 IAC 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.
- ii. At least 30 calendar days before changing the means of compliance from 35 IAC 218.401(a) (2) to 35 IAC 218.401(b) (2), the Permittee shall comply with all requirements of 35 IAC 218.404(d) (1).

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected printing lines. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.4.12 Compliance Procedures

- a. Compliance with Conditions 5.6 and 7.4.6 for each affected printing line or a group of printing lines shall be determined based upon the recordkeeping requirements of Condition 7.4.9 and the formula(s) given below:

$$E_v = \sum_{i=1}^n C_i W_i$$

Where:

n = The total number of VOM/HAP containing materials applied on line v

E<sub>v</sub> = Total VOM (or HAP) emissions from line v

C<sub>i</sub> = Quantity of VOM/HAP containing material used on line v each month (lbs/mo)

W<sub>i</sub> = VOM (or HAP) content of VOM/HAP containing material applied on line v each month (wt. % VOM)

V = Printing line identification

7.5 Unite 05 - Sheet Laminating Machine

7.5.1 Description

The new laminating machine will be fully automatic, and will laminate sheets of paper and cardboard by means of water based adhesive and thermo film.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
05	Laminator Machine (LAM1)	2006	None

7.5.3 Applicable Provisions and Regulations

- a. The "affected laminating machine" for the purpose of these unit-specific conditions, is the emission unit described in Conditions 7.5.1 and 7.5.2.
- b. i. The laminating line is subject to the NESHAP for Paper and Other Web Coating, 40 CFR Part 63, Subpart JJJJ, because the line is a web coating operation and is located at a plant that is a major source as defined in 40 CFR 63.2. The Illinois EPA is administering NESHAP in Illinois on behalf of the USEPA under a delegation agreement.
- ii. As a new source of HAPs for purposes of the NESHAP, 40 CFR 63, Subpart JJJJ, the organic HAP emissions from the laminating line shall not be more than 1.6 percent of the mass of coating materials as defined by 40 CFR 63.3310, applied for each month at the laminating line, pursuant to 40 CFR 63.3320(b)(2).
- c. The laminating line is subject to 35 IAC 218 Subpart F, which provides that no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following limit pursuant to 35 IAC 218.204(c). This limit is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition.

kg/l

lb/gal

0.28

2.3

- d. The affected laminating machine is subject to 35 IAC 212.321(b) (1), which provides that:

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, 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 subsection (c) of 35 IAC 212.321 (See also Attachment 2). [35 IAC 212.321(a)]

7.5.4 Non-Applicability of Regulations of Concern

- a. The laminating line is not subject to 35 IAC 218.301, because no line subject to the limits of 35 IAC 218.204 is required to meet the limits of 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209.
- b. The laminating line is not subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK, because the line is not a publication rotogravure, product and packaging rotogravure, or wide-web flexographic press.
- c. The laminating line is not subject to the NESHAP for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 63, Subpart QQ, because the line will not perform publication rotogravure printing.
- d. The laminating line is not subject to the New Source Performance Standards (NSPS) for the Polymeric Coating of Supporting Substrates Facilities, 40 CFR 63, Subpart VVV, because Subpart VVV applies to the web coating of substrates other than paper, plastic film, metallic film, or metal coil. The line does not meet this operational requirement.

7.5.5 Operational Limits and Work Practices

N/A

7.5.6 Production and Emission Limitations

Emissions of volatile organic materials (VOM) and VOM material usage from the laminating line shall not exceed the following limits:

VOM Material Usage		VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
0.9	7.1	0.9	7.1

These limits are based on maximum material usage, maximum VOM content of 1.5% by weight, and 8,760 hours/year operation of laminating machine as provided in the application. Compliance with annual limits shall be determined from a running total of 12 months of data.

The above limitations were established in Permit 06040032, pursuant to 35 IAC 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 CAA, specifically 35 IAC Part 203. [T1]

7.5.7 Testing Requirements

- a. The Permittee shall comply with all applicable NESHAP testing requirements of 40 CFR 63.3360 for the laminating line.
- b. Upon request by the Illinois EPA, the VOM content of specific coatings used on the coating lines shall be determined according to USEPA reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected laminating machine to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall comply with all applicable NESHAP recordkeeping requirements of 40 CFR 63.3410 for the laminating line.
- b. The Permittee shall keep the following records for the laminating line.
  - i. The name and identification of each coating.
  - ii. The VOM content of each coating (lb VOM/gallon).
  - iii. Records of each coating and other VOM containing materials used on the line, gallons/day and gallons/year.
  - iv. The VOM content of each material, % by weight.

- v. Density of each material, lbs/gallon.
- c. The Permittee shall keep records of monthly and annual VOM emissions from the laminating line based on the material usage, with supporting calculations.

7.5.10 Reporting Requirements

- a. The Permittee shall comply with the applicable NESHAP notification and reporting requirements of 40 CFR 63.3400 for the laminating line.
- b. If there is an exceedance of the requirements of Section 7.5, 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.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected laminating machine. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.5.12 Compliance Procedures

- a. The Permittee shall comply with the applicable NESHAP compliance procedures of 40 CFR 63.3370 for the laminating line.
- b. VOM emissions from the laminating machine shall be calculated as follows:

$$\text{VOM Emissions} = \text{Material Usage} \times \text{VOM Content}$$

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after August 12, 2007 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test

methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

## 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit.

Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA

every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [Section 39.5(7) (f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

#### 8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7) (a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;
- e. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The

test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

- a. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

- i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency  
Bureau of Air  
Compliance & Enforcement Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency  
Bureau of Air  
Air Quality Planning Section (MC 39)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment),

practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance or applicable requirements; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any regulated activity, discharge or emission at the source authorized by this permit.

#### 9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

#### 9.5 Liability

##### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

##### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

##### 9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

##### 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

##### 9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

## 9.6 Recordkeeping

### 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

### 9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12) (b) (iv) of the Act].

### 9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7) (e) (ii) of the Act].
- b. Other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

## 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Air Quality Planning Section no later than May 1 of the following year, as required by 35 IAC Part 254.

## 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7) (p) (v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Unit, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 to this permit.

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

##### 9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence [Section 39.5(7)(k) of the Act]:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

- ii. The permitted source was at the time being properly operated;
- iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed

description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations [Section 39.5(7)(k)(iv) of the Act].

#### 9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

##### 9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

- d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

#### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) of the Act.

#### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

#### 9.13 Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

**10.0 ATTACHMENTS**

Attachment 1 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

Attachment 2 Emissions of Particulate Matter from Process Emission Units

- a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].
- i. 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 subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

where:

P = Process weight rate; and  
 E = Allowable emission rate; and,

A. Up to process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

B. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

iii. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

b. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322].

- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

$$E = C + A(P)^B$$

where:

P = Process weight rate; and  
 E = Allowable emission rate; and,

A. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

B. For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

iii. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, [www.epa.state.il.us](http://www.epa.state.il.us). This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-revising.pdf](http://www.epa.state.il.us/air/caapp/caapp-revising.pdf)

Guidance On Renewing A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-renewing.pdf](http://www.epa.state.il.us/air/caapp/caapp-renewing.pdf)

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

[www.epa.state.il.us/air/caapp/index.html](http://www.epa.state.il.us/air/caapp/index.html)

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

[www.epa.state.il.us/air/caapp/199-caapp.pdf](http://www.epa.state.il.us/air/caapp/199-caapp.pdf)

[www.epa.state.il.us/air/permits/197-fee.pdf](http://www.epa.state.il.us/air/permits/197-fee.pdf)

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