

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

American Labelmark Company
Attn: Jeanne Zmich
5724 North Pulaski Road
Chicago, Illinois 60646-6797

Application No.: 05030061

I.D. No.: 031600GIB

Applicant's Designation:

Date Received: March 16, 2005

Subject: Label Printing Plant

Date Issued:

Expiration Date:

Location: 5724 North Pulaski Road, Chicago, Cook County, 60646-6797

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of four (4) flexographic printing presses, one (1) sheetfed offset non-heatset lithographic printing press and six (6) silkscreen printing presses as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
 - ii. To limit the emissions of VOM from the construction of new emission units and other modifications at the source, which occurred without first obtaining construction permit(s) between November 15, 1992 and June 15, 2005 (the period during which the Chicago area was classified as severe nonattainment for ozone), to less than 25 tons/year. As a result the source is excluded from the requirements of 35 Ill. Adm. Code Part 203, Major Stationary Source Construction and Modification.
 - iii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.

- iv. To establish federally enforceable production and operating limitations, which restrict the potential to emit for VOM to less than 25 tons per year so that the source is not subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units).
 - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permit(s) for this location.
2. Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith at a point beyond the property line of the source.
- 3a. Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012 except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations which use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;
- b. Pursuant to 35 Ill. Adm. Code 218.187(b), no owner or operator of a source subject to 35 Ill. Adm. Code 218.187, other than manufacturers of coatings, inks, adhesives, or resins, shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in 35 Ill. Adm. Code 218.187(b)(1), (b)(2), or (b)(3). No owner or operator of a source that manufactures coatings, inks, adhesives, or resins shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in at least one of the following subsections: 35 Ill. Adm. Code 218.187(b)(1), (b)(2), (b)(3), (b)(4), or (b)(5).
 - i. The VOM content of the as-used cleaning solutions (minus water and any compounds that are specifically exempted from the definitions of VOM) does not exceed the following emissions limitations:

Cleaning of ink application equipment:	kg/l	lb/gal
A. Screen printing, including screen reclamation activities	0.50	4.2
B. Flexographic printing that does not print flexible packaging	0.10	0.83

- ii. The composite vapor pressure of each as-used cleaning solution used does not exceed 8.0 mmHg measured at 20°C (68°F);
- c. Pursuant to 35 Ill. Adm. Code 218.204(c), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Paper Coating. Except as otherwise provided in 35 Ill. Adm. Code 218.204(a), (c), (g), (h), (j), (l), (n), (p), and (q), compliance with the emission limitations is required on and after March 15, 1996. The following emission limitations are 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, except where noted. 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. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. The emission limitations are as follows:

On and after May 1, 2011:	kg VOM/kg (1b VOM/lb) <u>solids applied</u>	kg VOM/kg (1b VOM/lb) <u>coatings applied</u>
i. Pressure sensitive tape and label surface coatings	0.20	(0.067)
ii. All other paper coatings	0.40	(0.08)

- d. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of this 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall apply only to photochemically reactive material.
- e. Pursuant to 35 Ill. Adm. Code 218.405(c)(2), on and after August 1, 2010: The requirements in 35 Ill. Adm. Code 218.407(a)(1)(A) and (a)(2) through (a)(5) and all applicable provisions in 35 Ill. Adm.

Code 218.409 through 218.411 shall apply to all owners or operators of lithographic printing lines if the combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) ever equal or exceed 6.8 kg/day (15 lbs/day), calculated in accordance with 35 Ill. Adm. Code 218.411(b)(1)(B), before the application of capture systems and control devices.

- f. Pursuant to 35 Ill. Adm. Code 218.407(a), no owner or operator of lithographic printing lines subject to the requirements of 35 Ill. Adm. Code 218 Subpart H (Printing and Publishing) shall:
 - i. Cause or allow the operation of any sheet-fed offset lithographic printing line unless:
 - A. The VOM content of the as-applied fountain solution is 5 percent or less, by weight; or
 - B. The VOM content of the as-applied fountain solution is 8.5 percent or less, by weight, and the temperature of the fountain solution is maintained below 15.6°C (60°F), measured at the reservoir or the fountain tray;
 - ii. Cause or allow the use of a cleaning solution on any lithographic printing line unless:
 - A. The VOM content of the as-used cleaning solution is less than or equal to:
 - I. 30 percent, by weight; or
 - II. On and after August 1, 2010, for owners or operators of sources that meet the applicability criteria in 35 Ill. Adm. Code 218.405(c)(3) and do not certify pursuant to 35 Ill. Adm. Code 218.411(g)(1)(B) that the source will not make use of any of the exclusions in 35 Ill. Adm. Code 218.405(c)(3), 70 percent, by weight; or
 - B. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F);
 - iii. Cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored or disposed of in any manner other than in closed containers, except when specifically in use.
- 4a. This permit is issued based upon the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK because this source is not a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2. This is a result of the federally enforceable production and operating limitations established in this permit that

restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs.

- b. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ because this source is not a major source of HAP, as defined in 40 CFR 63.2. This is a result of the federally enforceable production and operating limitations established in this permit that restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs
5. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- 6a. Pursuant to 35 Ill. Adm. Code 218.187(a)(2), notwithstanding 35 Ill. Adm. Code 218.187(a)(1):
- i. The following cleaning operations shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (e), (f), and (g).
 - A. Janitorial cleaning;
 - B. Stripping of cured coatings, inks, or adhesives;
 - C. Cleaning operations in printing pre-press areas, including the cleaning of film processors, color scanners, plate processors, film cleaning, and plate cleaning;
 - ii. Cleaning operations for emission units within the following categories shall be exempt from the requirements of 35 Ill. Adm. Code 218.187 (b), (c), (d), (e), (f), and (g):
 - A. Lithographic printing;
 - B. Paper, film, and foil coating;
 - iii. The cleaning of metering rollers, dampening rollers, and printing plates shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (f), and (g).

- b. Pursuant to 35 Ill. Adm. Code 218.204(c)(3), the paper coating limitation set forth in 35 Ill. Adm. Code 218.204(c) shall not apply to any owner or operator of any paper coating line on which flexographic rotogravure, lithographic, or letterpress printing is performed if the paper coating line complies with the applicable emissions limitations in 35 Ill. Adm. Code 218 Subpart H. In addition, screen printing on paper is not regulated as paper coating, but is regulated under 35 Ill. Adm. Code 218 Subpart TT. On and after May 1, 2011, the paper coating limitation shall also not apply to coating performed on or in-line with any digital printing press, or to size presses and on-machine coaters on papermaking machines applying sizing or water-based clays.

- c. This permit is issued based on the flexographic printing presses at this source not being subject to the control requirements of 35 Ill. Adm. Code 218.401 (Flexographic and Rotogravure Printing) as a result of the federally enforceable production and operating limitations of this permit, which restrict the maximum theoretical emissions of VOM from this facility to less than 100 tons per year and the potential to emit for VOM emissions to less than 25 tons per year. Pursuant to 35 Ill. Adm. Code 218.402(a), the limitations of 35 Ill. Adm. Code 218.401 shall apply to all flexographic and rotogravure printing lines at a subject source. Sources with flexographic and/or rotogravure printing lines are subject sources if:
 - i. Total maximum theoretical emissions of VOM from all flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines) at the source ever exceed 90.7 Mg (100 tons) per calendar year and the flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines) at the source are not limited to less than 90.7 Mg (100 tons) of VOM emissions per calendar year in the absence of air pollution control equipment through production or capacity limitations contained in a federally enforceable permit or a SIP revision; or
 - ii. The flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines) at the source have a potential to emit 22.7 Mg (25 tons) or more of VOM per year.

- d. Pursuant to 35 Ill. Adm. Code 218.405(c)(3), on and after August 1, 2010: Notwithstanding 35 Ill. Adm. Code 218.405(c)(2), at sources where the combined emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing line(s)) equal or exceed 6.8 kg/day (15 lbs/day) but do not exceed 45.5 kg/day (100 lbs/day), calculated in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B), before the application of capture systems and control devices, the following exclusions shall apply unless the owner or operator of the source certifies pursuant to 35 Ill. Adm. Code 218.411(g)(1)(B) that the source will not make use of any such exclusions:

- i. The requirements of 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), and (a)(3) shall not apply to lithographic printing lines with a total fountain solution reservoir of less than 3.8 liters (1 gallon);
 - ii. The requirements of 35 Ill. Adm. Code 218.407(a)(3) shall not apply to sheet-fed offset lithographic printing lines with maximum sheet size of 11x17 inches or smaller;
 - iii. The requirements of 35 Ill. Adm. Code 218.407(a)(4) shall not apply to up to a total of 416.3 liters (110 gallons) per year of cleaning materials used on all lithographic printing lines at the source;
 - iv. The requirements of 35 Ill. Adm. Code 218.407(a)(4)(A)(i) shall not apply to lithographic printing lines at the source. Instead, the requirements of 35 Ill. Adm. Code 218.407(a)(4)(A)(ii) shall apply to such lines.
- e. Pursuant to 35 Ill. Adm. Code 218.900(b)(1)(E), notwithstanding 35 Ill. Adm. Code 218.900(a) the requirements of this 35 Ill. Adm. Code 218 Subpart JJ (Miscellaneous Industrial Adhesives) shall not apply to miscellaneous industrial adhesive application operations associated with paper, film, and foil coatings.
 - f. This permit is issued based on the silkscreen printing presses at this source not being subject to the control requirements of 35 Ill. Adm. Code 218 Subpart TT (Other Emission Units). This is a result of the federally enforceable production and operating limitations of this permit, which restrict the maximum theoretical emissions of VOM from this facility to less than 100 tons per year and the potential to emit for VOM emissions to less than 25 tons per year.
- 7a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
 - b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
 - c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:

- i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- 8a. Pursuant to 35 Ill. Adm. Code 218.187(c), the owner or operator of a subject source shall demonstrate compliance with 35 Ill. Adm. Code 218.187 by using the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.187(g) and by complying with the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.187(e).
- b. Pursuant to 35 Ill. Adm. Code 218.187(d), the owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 218.187 shall comply with the following for each subject cleaning operation. Such requirements are in addition to work practices set forth in 35 Ill. Adm. Code 218.187(b)(4) and (b)(5), as applicable:
- i. Cover open containers and properly cover and store applicators used to apply cleaning solvents;
 - ii. Minimize air circulation around the cleaning operation;
 - iii. Dispose of all used cleaning solutions, cleaning towels, and applicators used to apply cleaning solvents in closed containers;
 - iv. Utilize equipment practices that minimize emissions.

- c. Pursuant to 35 Ill. Adm. Code 218.218(a), on and after May 1, 2011, every owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 218.204(c) shall:
 - i. Store all VOM-containing cleaning materials in closed containers;
 - ii. Ensure that mixing and storage containers used for VOM-containing materials are kept closed at all times except when depositing or removing those materials;
 - iii. Minimize spills of VOM-containing cleaning materials;
 - iv. Convey VOM-containing cleaning materials from one location to another in closed containers or pipes; and
 - v. Minimize VOM emissions from the cleaning of storage, mixing, and conveying equipment.
- d. Pursuant to 35 Ill. Adm. Code 218.402(e), any owner or operator of any flexographic or rotogravure printing line that is exempt from any of the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402 is subject to the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.404(b) and (f), as applicable.
- 9. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 10a. VOM emissions from printing operation shall not exceed the following limits:

<u>Emission Units</u>	<u>VOM Usage and Emissions</u>	
	<u>Ton/Month</u>	<u>Tons/Year</u>
Four Flexographic Presses	1.0	9.9
One Lithographic Press	1.4	14.2
Six Silk Screen Presses	0.1	<u>0.8</u>
	Total	24.9

These limits are based on maximum material usage, and individual VOM content. The above limitations are being established in this permit pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the emission units and other modifications at the source, which occurred without first obtaining construction permit(s) between November 15, 1992 and June 15, 2005 below the levels that would trigger the applicability of these rules. VOM and HAP emissions shall be calculated using the following equation:

$$E = \sum M_i \times V_i - W \times C_w$$

where:

E = VOM/HAP emissions (tons);

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

V_i = VOM/HAP content of raw materials (wt. fraction);

W = Certified amount of waste shipped-off (tons/month, tons/year); and

C_w = Certified VOM and HAP content of the waste (wt. fraction).

- b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA, the NESHAP for the Printing and Publishing Industry (40 CFR 63 Subpart KK), and the NESHAP for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ.
 - c. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month of total).
- 11a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
 - b. Testing required by Condition 12 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 12a. Pursuant to 35 Ill. Adm. Code 218.187(g)(1), testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218.187 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA, or as otherwise specified in 35 Ill. Adm. Code 218.187. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting the testing to allow the Illinois EPA to be present during the testing;
- b. Pursuant to 35 Ill. Adm. Code 218.187(g)(2), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.187(b)(1), and to determine the VOM content of cleaning solvents and cleaning solutions, shall be conducted as follows:
 - i. The applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) shall be used, provided, however, Method 24 shall be used to demonstrate compliance; or
 - ii. The manufacturer's specifications for VOM content for cleaning solvents may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a); provided, however, Method 24 shall be used to determine compliance. In the event of any inconsistency between a Method 24 test and the manufacturer's specifications, the Method 24 test shall govern;
 - c. Pursuant to 35 Ill. Adm. Code 218.187(g)(3), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
 - d. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.

- e. Pursuant to 35 Ill. Adm. Code 218.404(a), the VOM content of each coating and ink and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.404.
- f. Pursuant to 35 Ill. Adm. Code 218.409(a), testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218.407 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA, or as otherwise specified in 35 Ill. Adm. Code 218 Subpart H. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting such testing to allow the Illinois EPA to be present during such testing.
- g. Pursuant to 35 Ill. Adm. Code 218.409(c), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), (a)(3) and (a)(4)(A), and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of 35 Ill. Adm. Code 218.411(a)(1)(B), (b)(1)(B), or (b)(2)(B), as applicable, shall be conducted upon request of the Illinois EPA or as otherwise specified in 35 Ill. Adm. Code 218 Subpart H, as follows:
 - i. The applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) shall be used; provided, however, Method 24 shall be used to demonstrate compliance; or
 - ii. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a); provided, however, Method 24 shall be used to determine compliance.
- h. Pursuant to 35 Ill. Adm. Code 218.409(e), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 Ill. Adm. 218.110.
- 13a. Pursuant to 35 Ill. Adm. Code 218.410(a), Fountain Solution Temperature:
 - i. The owner or operator of any lithographic printing lines relying on the temperature of the fountain solution to demonstrate compliance shall install, maintain, and continuously operate a temperature monitor of the fountain solution in the reservoir or fountain tray, as applicable.

- ii. The temperature monitor must be capable of reading with an accuracy of 1°C or 2°C, and must be attached to an automatic, continuous recording device such as a strip chart, recorder, or computer, with at least the same accuracy, that is installed, calibrated and maintained in accordance with the manufacturer's specifications. If the automatic, continuous recording device malfunctions, the owner or operator shall record the temperature of the fountain solution at least once every two operating hours. The automatic, continuous recording device shall be repaired or replaced as soon as practicable.

- b. Pursuant to 35 Ill. Adm. Code 218.410(b), the owner or operator of any lithographic printing lines subject to 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2) or (a)(3) shall:
 - i. For a fountain solution to which VOM is not added automatically:
 - A. Maintain records of the VOM content of the fountain solution in accordance with 35 Ill. Adm. Code 218.411(e)(2)(C); or
 - B. Take a sample of the as-applied fountain solution from the fountain tray or reservoir, as applicable, each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution in the fountain tray or reservoir, and shall determine compliance with the VOM content limitation of the as-applied fountain solution by using one of the following options:
 - I. With a refractometer or hydrometer with a visual, analog, or digital readout and with an accuracy of 0.5 percent. The refractometer or hydrometer must be calibrated with a standard solution for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications, against measurements performed to determine compliance. The refractometer or hydrometer must be corrected for temperature at least once per 8-hour shift or once per batch of fountain solution prepared or modified, whichever is longer; or
 - II. With a conductivity meter if it is demonstrated that a refractometer and hydrometer cannot distinguish between compliant and noncompliant fountain solution for the type and amount of VOM in the fountain solution. A source may use a conductivity meter if it demonstrates that both hydrometers and refractometers fail to provide significantly different measurements for standard solutions containing 95 percent, 100 percent and 105 percent of the applicable VOM content limit. The conductivity meter reading for the fountain solution must be

referenced to the conductivity of the incoming water. A standard solution shall be used to calibrate the conductivity meter for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications;

- ii. For fountain solutions to which VOM is added at the source with automatic feed equipment, determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level. Records must be retained of the VOM content of the fountain solution in accordance with 35 Ill. Adm. Code 218.411(e)(2)(D). The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications.
- b. Pursuant to 35 Ill. Adm. Code 218.410(e), Cleaning Solution:
- i. The owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with 35 Ill. Adm. Code 218.407(a)(4)(A) must:
 - A. For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):
 - I. Install, operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed; and
 - II. Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with 35 Ill. Adm. Code 218.407(a)(4)(A).
 - B. For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) as set forth in 35 Ill. Adm. Code 218.411(f)(2).
 - ii. The owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with 35 Ill. Adm. Code 218.407(a)(4)(B) must keep records for such cleaning solutions used on any such lines as set forth in 35 Ill. Adm. Code 218.411(f)(2)(C).
14. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source

category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

15a. Pursuant to 35 Ill. Adm. Code 218.187(e)(3), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(1) shall collect and record the following information for each cleaning solution used:

- i. For each cleaning solution which is prepared at the source with automatic equipment:
 - A. The name and identification of each cleaning solution;
 - B. The VOM content of each cleaning solvent in the cleaning solution;
 - C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
 - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
 - E. The VOM content of the as-used cleaning solution with supporting calculations; and
 - F. A calibration log for the automatic equipment, detailing periodic checks;

- ii. For each batch of cleaning solution which is not prepared at the source with automatic equipment:
 - A. The name and identification of each cleaning solution;
 - B. Date, time of preparation, and each subsequent modification of the batch;
 - C. The VOM content of each cleaning solvent in the cleaning solution;
 - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
 - E. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are not prepared at the site but are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a);
- b. Pursuant to 35 Ill. Adm. Code 218.187(e)(4), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(2) shall collect and record the following information for each cleaning solution used:
 - i. The name and identification of each cleaning solution;
 - ii. Date, time of preparation, and each subsequent modification of the batch;
 - iii. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
 - iv. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
 - v. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
- c. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.
- d. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code

218.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:

- i. The name and identification number of each coating as applied on each coating line;
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
 - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(c)(2), the weight of VOM per weight of solids (or the weight of VOM per weight of coatings, as applicable) in each coating as applied each day on each coating line, and certified product data sheets for each coating.
- e. Pursuant to 35 Ill. Adm. Code 218.211(g)(3), on and after a date consistent with 35 Ill. Adm. Code 218.106(e), or on and after the initial startup date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 218.218 shall comply with the following: Maintain at the source all records required by 35 Ill. Adm. Code 218.211(g) for a minimum of three years from the date the document was created and make those records available to the Illinois EPA upon request.
- f. Pursuant to 35 Ill Adm. Code 218.404(b)(2), any owner or operator of a printing line which is exempted from any of the limitations of 35 Ill Adm. Code 218.401 because of the criteria in 35 Ill Adm. Code 218.402(a) shall comply with the following: On and after a date consistent with 35 Ill Adm. Code 218.106, or, for flexographic or rotogravure printing lines that print flexible packaging or that print flexible packaging and non-flexible packaging on the same line, on and after January 1, 2012, the owner or operator of a flexographic and rotogravure printing line referenced in 35 Ill Adm. Code 218.404(b)(2) shall collect and record all of the following information each year for each printing line and maintain the information at the source for a period of three years:
- i. The name and identification number of each coating and ink as applied on each printing line.
 - ii. The VOM content and the volume of each coating and ink as applied each year on each printing line.
- g. Pursuant to 35 Ill. Adm. Code 218.404(h), all records required by 35 Ill. Adm. Code 218.404(f) and (g) shall be retained for at least three years and shall be made available to the Illinois EPA upon request.

- h. Pursuant to 35 Ill. Adm. Code 218.411(e)(2), an owner or operator of a lithographic printing line subject to 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), or (a)(3) shall collect and record the following information for each fountain solution:
 - i. The name and identification of each batch of fountain solution prepared for use on one or more lithographic printing lines, the lithographic printing lines or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch;
 - ii. If an owner or operator uses a hydrometer, refractometer, or conductivity meter, pursuant to 35 Ill. Adm. Code 218.410(b)(1)(B), to demonstrate compliance with the applicable VOM content limit in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), or (a)(3):
 - A. The date and time of preparation, and each subsequent modification, of the batch;
 - B. The results of each measurement taken in accordance with 35 Ill. Adm. Code 218.410(b);
 - C. Documentation of the periodic calibration of the meter in accordance with the manufacturer's specifications, including date and time of calibration, personnel conducting, identity of standard solution, and resultant reading; and
 - D. Documentation of the periodic temperature adjustment of the meter, including date and time of adjustment, personnel conducting and results;
 - iii. If the VOM content of the fountain solution is determined pursuant to 35 Ill. Adm. Code 218.410(b)(1)(A), for each batch of as-applied fountain solution:
 - A. Date and time of preparation and each subsequent modification of the batch;
 - B. Volume or weight, as applicable, and VOM content of each component used in, or subsequently added to, the fountain solution batch;
 - C. Calculated VOM content of the as-applied fountain solution; and
 - D. Any other information necessary to demonstrate compliance with the applicable VOM content limits in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2) and (a)(3).
 - iv. If the VOM content of the fountain solution is determined pursuant to 35 Ill. Adm. Code 218.410(b)(2), for each setting:

- A. VOM content limit corresponding to each setting;
 - B. Date and time of initial setting and each subsequent setting;
 - C. Documentation of the periodic calibration of the automatic feed equipment in accordance with the manufacturer's specifications; and
 - D. Any other information necessary to demonstrate compliance with the applicable VOM content limits in 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2) and (a)(3), as specified in the source's operating permit;
- v. If the owner or operator relies on the temperature of the fountain solution to comply with the requirements in 35 Ill. Adm. Code 218.407(a)(1)(A)(ii) or (a)(3)(B):
- A. The temperature of the fountain solution at each printing line, as monitored in accordance with 35 Ill. Adm. Code 218.410(a); and
 - B. A maintenance log for the temperature monitoring devices and automatic, continuous temperature recorders detailing all routine and non-routine maintenance performed, including dates and duration of any outages.
- i. Pursuant to 35 Ill. Adm. Code 218.411(f)(2), for lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the limitations of 35 Ill. Adm. Code 218.407 shall collect and record the following information for each cleaning solution used on each lithographic printing line:
- i. For each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 Ill. Adm. Code 218.407(a)(4)(A) and which is prepared at the source with automatic equipment:
 - A. The name and identification of each cleaning solution;
 - B. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(c);
 - C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents) , and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
 - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;

- E. The VOM content of the as-used cleaning solution, supporting calculations; and
 - F. A calibration log for the automatic equipment, detailing periodic checks;
- ii. For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 Ill. Adm. Code 218.407(a)(4)(A) and that is not prepared at the source with automatic equipment:
- A. The name and identification of each cleaning solution;
 - B. Date and time of preparation, and each subsequent modification, of the batch;
 - C. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(c);
 - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
 - E. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a);
- iii. For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with 35 Ill. Adm. Code 218.407(a)(4)(B):
- A. The name and identification of each cleaning solution;
 - B. Date and time of preparation, and each subsequent modification, of the batch;
 - C. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with 35 Ill. Adm. Code 218.409(e). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a) and 218.110;
 - D. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and

- E. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with 35 Ill. Adm. Code 218.409(e). For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a) and 218.110;
 - iv. The date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any;
 - j. Pursuant to 35 Ill. Adm. Code 218.411(h), the owner or operator shall maintain all records required by 35 Ill. Adm. Code 218.411 at the source for a minimum period of three years and shall make all records available to the Illinois EPA upon request.
- 16a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Monthly and annual usage of the inks, coatings, fountain solutions and clean-up solvents (tons/month and tons/year);
 - ii. The VOM content and the HAP content of the inks, coatings, fountain solutions and clean-up solvents used (wt.%);
 - iii. Density of the inks, coatings, adhesives and clean-up solvents (lb/gallon); and
 - iv. Monthly and annual VOM and HAP emissions from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 17a. Pursuant to 35 Ill. Adm. Code 218.187(e)(2)(B), all sources subject to the requirements of 35 Ill. Adm. Code 218.187 shall: At least 30 calendar days before changing the method of compliance between 35 Ill. Adm. Code 218.187(b)(1), (b)(2), (b)(4), or (b)(5) and 35 Ill. Adm. Code 218.187(b)(3), notify the Illinois EPA in writing of such change. Such notification shall include a demonstration of compliance with the newly applicable subsection;

- b. Pursuant to 35 Ill. Adm. Code 218.187(e)(9), all sources subject to the requirements of 35 Ill. Adm. Code 218.187(b) and (d) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.187(b) or (d) by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation;
- c. Pursuant to 35 Ill. Adm. Code 218.211(c)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
 - i. Any record showing violation of 35 Ill. Adm. Code 218.204 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 method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1), as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) or (e), as applicable.
- d. Pursuant to 35 Ill. Adm. Code 218.211(g)(2), on and after a date consistent with 35 Ill. Adm. Code 218.106(e), or on and after the initial startup date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 218.218 shall comply with the following: Notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.218 by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation.
- e. Pursuant to 35 Ill. Adm. Code 218.404(b)(3), any owner or operator of a printing line which is exempted from any of the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402(a) shall comply with the following: on and after a date consistent with 35 Ill. Adm. Code 218.106, or, for flexographic or rotogravure printing lines that print flexible packaging or that print flexible packaging and non-flexible packaging on the same line, on and after January 1, 2012, the owner or operator of a flexographic and rotogravure printing line exempted from the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402(a) shall notify the Illinois EPA of any record showing that total maximum theoretical emissions of VOM from all printing lines exceed 90.7 Mg (100 tons) in any calendar year before the application of capture systems and control devices, or that the combined potential to emit of

all flexographic and rotogravure printing lines at the source equals or exceeds 22.7 Mg (25 tons) of VOM in any calendar year, by sending a copy of such record to the Agency within 30 days after the exceedance occurs.

- f. Pursuant to 35 Ill. Adm. Code 218.411(e)(3), an owner or operator of a lithographic printing line subject to 35 Ill. Adm. Code 218.407(a)(1)(A), (a)(2), or (a)(3), shall notify the Illinois EPA in writing of any violation of 35 Ill. Adm. Code 218.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation.
- g. Pursuant to 35 Ill. Adm. Code 218.411(f)(3), for lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of 35 Ill. Adm. Code 218.407 shall notify the Illinois EPA in writing of any violation of 35 Ill. Adm. Code 218.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation.
- h. Pursuant to 35 Ill. Adm. Code 218.411(g), the owner or operator of lithographic printing lines subject to one or more of the exclusions set forth in 35 Ill. Adm. Code 218.405(c)(3) shall:
 - i. If changing from utilization of the exclusions set forth in 35 Ill. Adm. Code 218.405(c)(3) to opting out of such exclusions pursuant to 35 Ill. Adm. Code 218.411(g)(1)(B), or if there is a change at the source such that the exclusions no longer apply, certify compliance in accordance with 35 Ill. Adm. Code 218.411(g)(1)(B) within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing lines will be in compliance with the applicable requirements of 35 Ill. Adm. Code 218.407;
 - ii. If changing from opting out of the exclusions set forth in 35 Ill. Adm. Code 218.405(c)(3) pursuant to 35 Ill. Adm. Code 218.411(g)(1)(B) to utilization of such exclusions, certify compliance in accordance with 35 Ill. Adm. Code 218.411(g)(1)(A) within 30 days after making such change.
- i. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
- 18a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant

records, and a description of the exceedances or deviation and efforts to reduce emissions and future occurrences.

- b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance and Enforcement Section (#40)
P.O. Box 19276
Springfield, IL 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

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

If you have any questions on this permit, please call Valeriy Brodsky at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

REP:VJB:

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the label printing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAP), at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is used and control measures are more effective than required in this permit.

<u>Emission Units</u>	E M I S S I O N S (tons/year)		
	<u>VOM</u>	<u>Single HAP</u>	<u>Total HAPs</u>
Four Flexographic Presses	9.9		
One Lithographic Press	14.2		
Six Silk Screen Presses	<u>0.8</u>		
Total	24.9	9.0	22.5

VJB: