

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Vision Integrated Graphics, LLC  
Attn: Robert Schultz  
8301 West 183rd Street  
Tinley Park, Illinois 60477-6225

Application No.: 07060079

I.D. No.: 197491AAD

Applicant's Designation:

Date Received: June 29, 2007

Subject: Commercial Printing

Date Issued:

Expiration Date:

Location: 8301 West 183rd Street, Tinley Park, Will County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of eight (8) sheet-fed non-heatset offset lithographic printing presses/coaters, six (6) digital lithographic printing presses and two (2) UV coaters pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
  - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single hazardous air pollutant (HAP) and 25 tons/year 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 emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year to less than 15 tons. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205, except reporting requirements of 35 Ill. Adm. Code 205.300 which are described in Attachment B.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits for this location.
- 2a. 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

the specified coating. 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. (Note: The equation presented in 35 Ill. Adm. Code 218.206 shall be used to calculate emission limitations for determining compliance by add on controls, credits for transfer efficiency, emissions trades and cross line averaging.) The emission limitations are as follows:

	<u>kg/l</u>	<u>lb/gal</u>
Paper Coating	0.28	(2.3)

- b. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.
- c. Pursuant to 35 Ill. Adm. Code 218.407(a), no owner or operator of lithographic printing line(s) subject to the requirements of 35 Ill. Adm. Code 218 Subpart H 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 volume; or
    - B. The VOM content of the as-applied fountain solution is 8.5 percent or less, by volume, 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 30 percent, by weight; or
    - ii. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20° (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.
- 3. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.
- 4. 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.
- 5a. Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205.
- b. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period.
- 6a. Volatile Organic Material (VOM) emissions from the eight (8) printing presses/coaters (#1, #2, #3, #4, #5, #6, #7, and #8) shall not exceed 1.8 tons/month and 18.3 tons/year. The above limitations were established in Permit 99040044, pursuant to 35 Ill. Adm. Code 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 Clean Air Act, specifically 35 Ill. Adm. Code Part 203.
- b. The VOM emissions from the six (6) sheet-fed non-heatset offset lithographic printing presses/coaters (#9, #11, #12, #14, #16, and #17), which were constructed after June 15, 2005, shall not exceed 1.5 tons/month and 14.7 tons/year. These limits are based on the maximum production rate, the highest VOM content of raw materials and 95% conventional lithographic ink VOM retention.
- c. The combined VOM emission from sheet-fed non-heatset offset lithographic printing press/coater #19 and digital lithographic printing press #18 shall not exceed the following limits: 1.1 tons/month and 10.4 tons/year. These limits are based on the maximum production rate, the highest VOM content of raw materials and 95% conventional lithographic ink VOM retention.

- d. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.99 tons/month and 19.9 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.
- e. The VOM and HAP emissions shall be determined using the following equation:

$$E = \Sigma (I \times C_I) \times 0.05 + \Sigma (S \times C_S) - W \times C_W,$$

Where:

E = VOM and HAP emission (tons);

I = Conventional lithographic ink usage (tons/month);

C<sub>I</sub> = VOM and HAP content of the conventional lithographic ink (% by weight);

S = Solvent-containing materials usage (tons/month);

C<sub>S</sub> = VOM and HAP content of the solvent-containing materials (% by weight);

W = Certified amount of waste shipped-off (tons); and

C<sub>W</sub> = Certified VOM and HAP content of the waste ((% by weight)

HAP content of the waste may assume proportional to HAP/VOM  
ration of raw materials

- f. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 7a. 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 8 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 8a. 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.
  - b. 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. Such testing shall be conducted at the expense of the owner or operator and the owner or operation 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.
  - c. 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)), shall be conducted upon request of the Illinois EPA, 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 24 Ill. Adm. Code 218.105(a); provided, however, Method 24 shall be used to determine compliance.

d. 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.

9a. Pursuant to 35 Ill. Adm. Code 218.410(a), Fountain Solution Temperature:

- i. The owner or operator of any lithographic printing line(s) 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), Fountain Solution VOM Content. The owner or operator of any lithographic printing line(s) 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(c) (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(c) (2) (D). The equipment used to make automatic additions must be installed, calibrated, operated, and maintained in accordance with manufacturer's specifications.
- c. 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(d) (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 line(s) as set forth in 218.411(d) (2) (C).
10. 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.
- 11a. 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 and complying by means of 35 Ill. Adm. Code 218.204 shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
- i. The name and identification number of each coating 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.

b. Pursuant to 35 Ill. Adm. Code 218.411(c) (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 line(s) 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 218.407(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 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 limits 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) or (a) (3).
  - 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;
- d. Pursuant to 35 Ill. Adm. Code 218.411(d) (2), 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 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, with 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 which 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.
- 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);
  - 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).
  - 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.
- 12a. The Permittee shall maintain monthly records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Names and amounts of each conventional lithographic ink, digital ink and oils, fountain solution and clean-up solvent used (tons/month, tons/year);
  - ii. VOM and HAP content of each conventional lithographic ink, digital ink and oil, fountain solution and clean-up solvent used (weight %);
  - iii. Certified amount of waste solvent shipped off-site (tons);
  - iv. Certified VOM content of the waste material (weight %); and
  - v. Monthly and annual VOM and HAP emissions with supporting calculations (tons/month, tons/year). HAP emissions shall be calculated as a fraction of total VOM emission proportional to VOM/HAP ratio in the raw materials.
- b. The Permittee shall maintain the following records to determine compliance with the 15 tons VOM/ozone season limitation specified in Condition 5:
- i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
  - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in this permit; and
  - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.
- c. 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 the Illinois EPA or USEPA request for records during the course of a source inspection.

- 13a. 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 and complying by means of 35 Ill. Adm. Code 218.204 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), respectively. 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), respectively.
- b. Pursuant to 35 Ill. Adm. Code 218.411(c), 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:
- i. 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; and
  - ii. If changing its method of demonstrating compliance with the applicable VOM content limitations in 35 Ill. Adm. Code 218.407, or changing the method of demonstrating compliance with the VOM content limitations for fountain solutions pursuant to 35 Ill. Adm. Code 218.409, certify compliance for such new method in accordance with 35 Ill. Adm. Code 218.411(c)(1), within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing line(s) will be in compliance with the applicable requirements of 35 Ill. Adm. Code 218.407(a).
- c. Pursuant to 35 Ill. Adm. Code 218.411(d), 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:

- i. 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; and
  - ii. If changing its method of demonstrating compliance with the requirements of 35 Ill. Adm. Code 218.407(a)(4), or changing between automatic and manual methods of preparing cleaning solutions, certify compliance for such new method in accordance with 35 Ill. Adm. Code 218.411(d)(1), within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing line(s) will be in compliance with the applicable requirements of 35 Ill. Adm. Code 218.407(a)(4).
- 14a. 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. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by October 31 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 Ill. Adm. Code 205.205(a) and 35 Ill. Adm. Code 205.300.
  - c. Two (2) copies of required reports and shall be sent to:

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

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

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

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If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

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

ECB:VJB:

cc: IEPA, FOS Region 1  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the printing facility 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 per year of VOM, 10 tons per year for a single HAP, and 25 tons per 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 material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)		
	<u>VOM</u>	<u>Single HAP</u>	<u>Total HAPs</u>
Printing Presses/coaters #1, #2, #3, #4, #5, #6, #7, & #8	18.3		
Printing Presses/Coaters #9, #11, #12, #14, #16, & #17	14.7		
<u>Printing Press/Coater #19 &amp; Printing Press #18</u>	<u>10.4</u>	<u>--</u>	<u>--</u>
Totals	43.4	<u>7.9</u>	<u>19.9</u>

VJB:

Attachment B - Emissions Reduction Market System (ERMS)

1. Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' FESOP or 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 should have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 Ill. Adm. Code 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 Ill. Adm. Code 205.500 and 35 Ill. Adm. Code 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 Ill. Adm. Code 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 Ill. Adm. Code 205.630).

2. Applicability

Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons, not including VOM emissions from insignificant emission units and activities. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm.

Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205.

3. Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to determine compliance with the above limitation:
  - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
  - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures, which may be specified in this permit; and
  - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.
- b. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by October 31 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 Ill. Adm. Code 205.205(b) and 35 Ill. Adm. Code 205.300.
- c. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and shall immediately comply with 35 Ill. Adm. Code Part 205, including holding allotment trading units (ATUs) for its VOM emissions during the first seasonal allotment period it exceeds 15 tons and each seasonal allotment period, thereafter, pursuant to 35 Ill. Adm. Code 205.150(c).