

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Meyercord Revenue Company
Attn: Mo Musghati
475 Village Drive
Carol Stream, Illinois 60188

<u>Application No.:</u> 01050092	<u>I.D. No.:</u> 043020ACH
<u>Applicant's Designation:</u> REVENUE-01	<u>Date Received:</u> September 2, 2005
<u>Subject:</u> Tax Stamp Printing and Print Pad Manufacturing	
<u>Date Issued:</u> November 21, 2005	<u>Expiration Date:</u> April 29, 2008
<u>Location:</u> 475 Village Drive and 475 North Gary Avenue, Carol Stream	

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

Meyercord Revenue Operations:

One Rotogravure Press with Oven
Ink-Jet Numbering Machine
Ink-Jet Imaging System
Ink Mixing
Parts Washer
Natural Gas-Fired Combustion Units

Trans Tech America (TTA) Operations:

Pad Manufacturing Process
Ink Mixing Operation and Solvent Repackaging Operation
Two Spray Coating Lines
Film Developing Unit
Ferric Chloride Etching Process
Potassium Hydroxide Stripping Process
Natural Gas-Fired Combustion Units
Pad Printing Operation

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 combination of HAPs). As a result the source is excluded from the requirement 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 volatile organic material from the source to less than 25 tons/year. As a result, the source is excluded from the requirements 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.
 - b. Prior to initial issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permits issued for this location.
2. This permit is issued based on the rotogravure printing line(s) being exempted from the requirements of 35 Ill. Adm. Code Section 218 Subpart H, "Printing and Publishing", pursuant to 35 Ill. Adm. Code 218.402. The combined total potential emissions of volatile organic material (VOM) from all rotogravure printing line(s) (including solvents used for cleanup operations associated with the rotogravure printing line) shall be limited to less than 25 tons per year. Therefore, the requirements of 35 Ill Adm. Code Section 218.401 are not applicable to the rotogravure printing lines.
- 3a. This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 Ill. Adm. Code Part 205, pursuant to 35 Ill. Adm. Code 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.
- b. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, 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 that may be specified in this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
 - c. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following

seasonal allotment period, shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in a Clean Air Act Permit Program (CAAPP) permit or a Federally Enforceable State Operating Permit (FESOP).

- d. Pursuant to 35 Ill. Adm. Code 205.316(a), any participating or new participating source shall not operate without a CAAPP permit or FESOP. Pursuant to 35 Ill. Adm. Code 205.316(a)(2), if a participating or new participating source does not have a CAAPP permit containing ERMS provisions and the source elects to obtain a permit other than a CAAPP permit, the source shall apply for and obtain a FESOP that contains, in addition to other necessary provisions, federally enforceable ERMS provisions, including baseline emissions, allotment for each seasonal allotment period, identification of any units deemed to be insignificant activities for purposes of the ERMS, emissions calculation methodologies, and provisions addressing all other applicable requirements of 35 Ill. Adm. Code Part 205.
4. Emissions of volatile organic material (VOM) and operation of the following equipment shall not exceed the following limits:

<u>Equipment</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Rotogravure Press with Oven	3.1	24.4	3.1	24.4
Ink-Jet Numbering Machine				
Ink-Jet Imaging System				
Ink Mixing				
Parts Washer				
Pad Manufacturing Process				
Ink Mixing Operation and Solvent Repackaging Operation				
Two Spray Coating Lines				
Pad Printing Operation				

These limits define the potential emissions of VOM and are based on maximum material usage, individual VOM content, and limits as requested by the company. VOM usage shall be calculated using the equation in Condition 10(e). Compliance with annual limits shall be determined from a running total of 12 months of data.

- 5a. Emissions and operation of all fuel combustion emission units shall not exceed the following limits:

<u>Material</u>	<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>Pollutant</u>	<u>Emission Factor (Lb/mmscf)</u>	<u>Emissions (Tons/Mo)</u>	<u>(Tons/Yr)</u>
Natural Gas	20	180	NO _x	100	1.0	9.0
			CO	84	0.84	7.6
			PM	7.6	0.1	0.7
			VOM	5.5	0.1	0.5

These limits define the potential emissions of NO_x, CO, PM, and VOM and are based on maximum fuel usage and standard emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas shall be the only fuel used in all the fuel combustion units. Use of any other fuel other than natural gas requires a permit revision.
6. This permit is issued based on negligible emissions of particulate matter from the film developing unit, ferric chloride etching process, and potassium hydroxide stripping process. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
7. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
8. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
9. Pursuant to 35 Ill Adm. Code Section 218.404 (b), an owner or operator of a rotogravure printing line exempted from the limitations of Section 218.401 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:
- a. The name and identification number of each ink as applied on each printing line.
 - b. The VOM content and the amount of each ink as applied each year on each printing line.

- c. On and after a date consistent with Section 218.106 of this Part, the owner or operator of a flexographic and rotogravure printing line exempted from the limitations of Section 218.401 of this Part because of the criteria in Section 218.402 of this Part shall notify the Agency 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 by sending a copy of such record to the Agency within 30 days after the exceedance occurs.
10. The Permittee shall maintain monthly records of the following items:
- a. Identification and amount of each ink, primer, clean up solvent, thinner, and any other material used containing VOM and/or HAP (gal or ton/mo and gal or ton/yr);
 - b. VOM content of each ink, primer, clean up solvent, thinner, and any other material used containing VOM and/or HAP (lb VOM/gal or weight %);
 - c. Individual HAP content of each ink, primer, clean up solvent, thinner, and any other material used containing VOM and/or HAP (lb VOM/gal or weight %);
 - d. Total natural gas usage (mmscf/mo and mmscf/yr); and
 - e. Detailed calculations of VOM and individual HAP usages for the sources in Condition 3 using the following equation:

$$T_e = \sum_i^n A_i B_i$$

Where:

T_e = VOM or single HAP usage in units of lb/mo

n = Number of different VOM and/or HAP containing material used each month;

i = Subscript denoting an individual VOM and/or HAP containing material

A_i = Weight of VOM or single HAP per volume of each solvent used each month in units of lbs VOM or HAP/gallon or weight percent of VOM/HAP or single HAP of each VOM containing material used each month (% weight)

B_i = Amount of each VOM and/or HAP containing material used each month in units of gallons/month or lbs/month

- f. Detailed calculations of plantwide VOM and individual HAP emissions (tons/month and tons/year).
11. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
12. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
13. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:
- Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276
- and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:
- Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016
14. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: Solvent usages, solvent VOM-HAP content, and detailed calculations of plantwide VOM/HAP emissions from the prior calendar year. If there has been no exceedance of a required of this permit during the prior calendar year, the annual emission report shall contain a statement to that effect.

It should be noted that this permit has been revised to incorporate Construction Permit #05090002 to include a pad printing operation for the TTA facility.

Page 7

It should be noted that this FESOP includes equipment at the Meyercord Revenue facility at 475 Village Drive and the Trans Tech America facility at 475 North Gary Avenue.

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

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

DES:GMK:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the Printing and Print Pad 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 at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Equipment/Process</u>	E M I S S I O N S				(Tons/Year)	
					HAPs	
	<u>NO_x</u>	<u>CO</u>	<u>PM</u>	<u>VOM</u>	<u>Single</u>	<u>Combined</u>
Retrogravure Press with Oven				24.4		
Ink-Jet Numbering Machine						
Ink-Jet Imaging System						
Ink Mixing						
Part Washer						
Pad Manufacturing Process						
Ink Misting Operation & Solvent Repackaging Operation						
Two Spray Coating Lines						
Pad Printing Operation						
Film Developing Unit			0.44			
Ferric Chloride Etching Process			0.44			
Potassium Hydroxide Stripping Process			0.44			
Natural Gas-Fired Combustion Units	<u>9.0</u>	<u>7.6</u>	<u>0.70</u>	<u>0.5</u>		
Totals	9.0	7.6	2.02	24.9	< 10	< 25

GMK:01050092:psj