

217/782-2113

RENEWAL
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE:

Rollprint Packaging Products, Inc.
Attn: Mark E. Pederson, Environmental, Health, & Safety Manager
320 South Stewart Avenue
Addison, Illinois 60101-3310

I.D. No.: 043005AJS
Application No.: 95090106

Date Received: December 29, 2003
Date Issued: March 31, 2006
Expiration Date¹: March 31, 2011

Operation of: Rollprint Packaging Products, Inc, Paper and Allied Products Facility
Source Location: 320 South Stewart Avenue, Addison, DuPage, 60101-3375
Responsible Official: Dhuanne Dodrill, President and COO

This permit is hereby granted to the above-designated Permittee to OPERATE a paper and allied products facility, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

DES:JMY:psj

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

¹ This permit contains terms and conditions that address the applicability, and, if determined applicable, substantive requirements of Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. The authority for these provisions is found in these regulations and in the general authority provided to the Illinois EPA by Section 9.1 of the Environmental Protection Act (Act) and Sections 39(a) and 39.5(7) (a) of the Act, which authorize the Illinois EPA to include conditions in permits that are required to accomplish the purposes of the Act. Any such terms and conditions are specifically identified within this permit as T1 conditions. These terms and conditions continue in effect as provided by Condition 8.7 of this permit, notwithstanding the expiration date specified above, as their authority derives from Title I, as well as from Title V of the CAA.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Rollprint Packaging Products, Inc.
320 Stewart Avenue
Addison, Illinois 60004

630/628-1700 Extension 3322

I.D. No.: 043005AJS

Standard Industrial Classification: 2671, Paper and Allied Products
Source

1.2 Owner/Parent Company

Rollprint Packaging Products, Inc.
320 Stewart Avenue
Addison, Illinois 60101-3310

1.3 Operator

Rollprint Packaging Products, Inc.
320 Stewart Avenue
Addison, Illinois 60101-3310

Mark Pederson, Environmental, Health, and Safety Manager
630/628-1700 Extension 3322

1.4 Source Description

The source is a converter of flexible and semi-rigid packaging materials and composite products used primarily in high-end medical, food, and industrial applications. As a custom converter, the source creates packaging materials and composite products designed to meet a customers particular needs. The Source uses PTE's and an RTO to control VOM and HAP emissions.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM), and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

- a. This permit contains "Title I conditions" that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."
- b. This permit contains Title I conditions that are newly established in this CAAPP permit, which conditions are specifically designated as "T1N."

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BACT	Best Available Control Technology
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CPMS	Continuous Parameter Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	Kilogram
l	Liter
kW	kilowatts
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
Mg	Megagram
mmBtu	Million British thermal units
mmft ³	Million Cubic Feet
mmtherms	Million Therms
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
RMP	Risk Management Plan
RTO	Regenerative Thermal Oxidizer
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit

T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

None

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

None

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

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

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

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

3.2 Compliance with Applicable Requirements

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

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

3.3 Addition of Insignificant Activities

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment	
			PTE	RTO
01 Coater/Laminators	Ultra-Lam Coater/Laminator	02/91	PTE	RTO
	GFG Coater/Laminator	12/68	PTE	
	Duoflex Coater/Laminator	12/70		
02 Extruder/Laminator, Coater	Millennium Extruder/Laminator	12/97	None	
	ROTO Rotogravure Coater/Printer in coater mode	01/82		
03 Printing Presses	ROTO Rotogravure Coater/Printer in Printer Mode	01/82	None	
	660 Kidder Flexographic Printing Press	02/82		
	434 Kidder Flexographic Printing Press	03/82		
	Heinrich Flexographic Printing Press	04/82		
	Ashton Flexographic Printing Press	05/82		
04 Fuel Combustion Emission Units	Ultra-Lam Oven	02/91	None	
	GFG Oven	12/68		
	Duoflex Oven	12/70		
	Ultra-Lam, GFG, Duoflex RTO	05/2004		
	Millennium Oven	12/97		
	660 Kidder Oven	02/82		
	434 Kidder Oven	03/82		
	Heinrich Oven	04/82		
	Roto Oven	01/82		

5.0 OVERALL SOURCE CONDITIONS

5.1 Applicability of Clean Air Act Permit Program (CAAPP)

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

5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment), PM₁₀ (moderate nonattainment), and attainment or unclassifiable for all other criteria pollutants (CO, Lead, NO₂, SO₂).

5.3 Source-Wide Applicable Provisions and Regulations

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

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

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.
- c. Pursuant to 35 IAC 237.102, no person shall cause or allow open burning, except the Illinois EPA may grant permits for open burning in accordance with 35 IAC 237.201.

5.3.3 Fugitive Particulate Matter Operating Program

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

amendments to the program submitted pursuant to paragraph b below.

- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.3.4 Ozone Depleting Substances

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

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

5.3.5 Risk Management Plan (RMP)

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

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

5.3.6 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable regulations under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B that were promulgated after the date issued of this permit.

5.3.7 Episode Action Plan

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

5.3.8 PM₁₀ Contingency Measure Plan

Should the actual annual source-wide emissions of PM₁₀ equal or exceed 15 tons, then the Permittee shall prepare and submit a contingency measure plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall submit such plan to the Illinois EPA for review and approval within ninety (90) days after the date this source becomes subject to this requirement. Such plan will be incorporated by reference into this permit and shall be implemented by the

Permittee in accordance with 35 IAC 212.704 following notification by the Illinois EPA. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U. This permit may also have to be revised or reopened to address this regulation (see Condition 9.12.2).

5.4 Source-Wide Non-Applicability of Regulations of Concern

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

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. There may be requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	132.56
Sulfur Dioxide (SO ₂)	0.068
Particulate Matter (PM)	1.16
Nitrogen Oxides (NO _x)	8.63
HAP, not included in VOM or PM	----
Total	142.418

5.6.2 Emissions of Hazardous Air Pollutants

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

5.6.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, state rules for Major Stationary Sources Construction and Modification, 35 IAC

Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].
- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Source-Wide Monitoring Requirements

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

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units)

of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 Records for HAP Emissions

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

5.9.3 Retention and Availability of Records

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

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

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

5.10.2 Annual Emissions Report

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

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

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

5.12 Source-Wide Compliance Procedures

5.12.1 Procedures for Calculating Emissions

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

6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

6.1 Emissions Reduction Market System (ERMS)

6.1.1 Description of ERMS

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

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

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

6.1.2 Applicability

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

6.1.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.1.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.1.5.
 - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.1.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.1.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.1.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.1.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.1.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.1.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data is not

yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.1.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 336 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 38.1190 tons per season.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.1.10 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.1.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units

None
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
 - ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and
 - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.1.9 Recordkeeping for ERMS

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

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

6.1.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

NG Fired Combustion Unit

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Unit 01 - Coater/Laminators
Control - PTE's and RTO

7.1.1 Description

Three coater/laminators are used to laminate and coat films, foils, paper, and other composite materials using water-based or solvent-based coatings. Over-lacquers and primers may also be applied on this equipment. The only difference between laminating and coating is that a secondary web is introduced during the laminating process. Each coater/laminator has an oven to dry the coatings. Emissions are vented through a PTE into an RTO to control VOM. VOM emissions result from the use of solvent based materials

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment	
01 Coater/ Laminators	Ultra-Lam Coater/Laminator	2/91	PTE	RTO
	GFG Coater/Laminator	12/68	PTE	
	Duoflex Coater/Laminator	12/70		

7.1.3 Applicable Provisions and Regulations

- a. The "affected coater/laminators" for the purpose of these unit-specific conditions, is each coater/laminator described in Conditions 7.1.1 and 7.1.2.
- b. When processing non-compliant coatings, the affected coater/laminators shall be equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coater/laminators and the control device has a 90 percent efficiency [35 IAC 218.207(b) (1)].
- c. When processing compliant coatings, the owner or operator of an affected coater/laminator shall not apply at any time any coating in which the VOM content exceeds the following limitations [35 IAC 218.204(c)]:

kg/liter	lb/gallon
0.28	2.3

- d. The "affected coater/laminators" are subject 40 CFR 63 Subpart JJJJ - NESHAP: Paper and Other Web Coating because the source is a major source for HAP emissions as defined in 40 CFR 63.2, at which web coating lines are operated [40 CFR 63.3290].

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected coater/laminators are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, which excludes the affected coater/laminators from these requirements.
- b. The affected coater/laminators are not subject to the testing requirements of 35 IAC 218.105(c)(2), because the affected coater/laminators are equipped with (or use) a PTE that meets Illinois EPA and USEPA specifications, and which directs all VOM to a control device [35 IAC 218.105(c)(1)(A)].

7.1.5 Control Requirements and Work Practices

- a. The capture system and control device shall be operated at all times each affected Coater/Laminator is in operation [35 IAC 218.207(a)] except when complying with 35 IAC 218.204.
- b. When the affected RTO is used to comply with HAP emission standards of 40 CFR 63.3320, the Source shall:
 - i. Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment whether you choose not to perform the calibration or the equipment cannot be calibrated properly [40 CFR 63.3350(e)(9)(i)].
 - ii. For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of +/-1 percent of the temperature being monitored in degrees Celsius, or +/-1° Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone [40 CFR 63.3350(e)(9)(ii)].
- c. When the affected RTO is used to comply with operating limits of 40 CFR 63.3321, the Source must submit a monitoring plan to the IEPA Administrator that identifies operating parameters to be monitored according to 40 CFR 63.3350(f) [Table 1 of 40 CFR 63 Subpart JJJJ].

d. Startup, Shutdown, and Malfunction Plan.

The owner or operator of an affected source must develop and implement a written startup, shutdown, and malfunction plan according to 40 CFR 63.6(e)(3)(i) through 40 CFR 63.6(e)(3)(ix), pursuant to 40 CFR 63.6(e)(3) and 40 CFR 63.3340.

7.1.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected Coater/Laminators are subject to the following:

- a. The affected Ultra-Lam Coater Laminator shall not exceed 17.11 tons per month, and 205 tons per year of VOM usage. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). This limit was established in Permit 91010089 [T1].
- b. VOM emissions from the affected Ultra-Lam Coater Laminator shall not exceed 3.25 tons per month and 39.0 tons per year. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). These limits were established in Permit 91010089 [T1].
- c. VOM emissions from cleaning solvents shall not exceed 3.25 tons per month and 39.0 tons per year. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). These limits were established in Permit 91010089 [T1].
- d. The above limitations were established in Permit 91010089, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].
- e. The affected Coater Laminators must comply with HAP emission standards of 40 CFR 63.3320(b) and (c) as follows:
 - i. Each coating material used shall not exceed 0.04 kg HAP/kg coating material as purchased, pursuant to 40 CFR 63.3370(a)(1)(i).
 - ii. Each coating material used shall not exceed 0.2 kg HAP/kg coating solids as purchased, pursuant to 40 CFR 63.3370(a)(1)(ii).

- iii. Each coating material used shall not exceed 0.04 kg HAP/kg coating material as applied, pursuant to 40 CFR 63.3370(a)(2)(i).
 - iv. Each coating material used shall not exceed 0.2 kg HAP/kg coating solids as applied, pursuant to 40 CFR 63.3370(a)(2)(ii).
 - v. The monthly average of all coating materials used shall not exceed 0.04 kg HAP/kg coating material as applied on a monthly basis, pursuant to 40 CFR 63.3370(a)(2)(iii).
 - vi. The monthly average of all coating materials used shall not exceed 0.2 kg HAP/kg coating solids as applied on a monthly basis, pursuant to 40 CFR 63.3370(a)(2)(iv).
 - vii. The total monthly HAP applied shall not exceed the calculated allowable limit, pursuant to 40 CFR 63.3370(a)(3).
 - viii. The overall HAP control efficiency of the PTE and RTO shall be equal to 95% on a monthly basis, pursuant to 40 CFR 63.3370(a)(4)(i).
 - ix. When the affected RTO is used to comply with operating limits of 40 CFR 63.3321, the average combustion temperature in any 3-hour period must not fall below the combustion temperature established according to 40 CFR 63.3360(e)(3)(i) [Table 1 of 40 CFR 63 Subpart JJJJ].
 - x. The above limitations are being established in this permit. The "affected coater/laminators" are subject to 40 CFR 63 Subpart JJJJ - NESHAP: Paper and Other Web Coating. The Source has requested these limits to comply with the HAP emission limits of 40 CFR 63 Subpart JJJJ. [T1N]
- f. Compliance with the above annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) pursuant to Section 39.5(7)(b) of The Act. [T1N]

7.1.7 Testing Requirements

- 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 IAC 218.105 [35 IAC 218.204 and 218.207(a)].

- b. Sources utilizing a PTE must demonstrate that this enclosure meets the requirement given in 35 IAC Part 218 Procedure T of Appendix B for a PTE during any testing of their control device [35 IAC 218.105(c)(3)(D)].
- c. The control device efficiency shall be determined by simultaneously measuring the inlet and outlet gas phase VOM concentrations and gas volumetric flow rates in accordance with the gas phase test methods specified in 35 IAC 218.105(f) [35 IAC 218.105(d)(1)].
- d. The following VOM gas phase source test methods shall be used to determine control device efficiencies [35 IAC 218.105(f)].
 - i. 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, as appropriate to the conditions at the site, shall be used to determine VOM concentration. Method selection shall be based on consideration of the diversity of organic species present and their total concentration and on consideration of the potential presence of interfering gases. The test shall consist of three separate runs, each lasting a minimum of 60 minutes, unless the Illinois EPA and the USEPA determine that process variables dictate shorter sampling times.
 - ii. 40 CFR Part 60, Appendix A, Method 1 or 1A, shall be used for sample and velocity traverses.
 - iii. 40 CFR Part 60, Appendix A, Method 2, 2A, 2C or 2D, shall be used for velocity and volumetric flow rates.
 - iv. 40 CFR Part 60, Appendix A, Method 3, shall be used for gas analysis.
 - v. 40 CFR Part 60, Appendix A, Method 4, shall be used for stack gas moisture.
 - vi. 40 CFR Part 60, Appendix A, Methods 2, 2A, 2C, 2D, 3 and 4, shall be performed, as applicable, at least twice during each test run.
- e. The percent concentration of solvent in the VOM containing waste from the affected Coater/Laminator shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.
- f. The following test methods must be used to determine compliance with test requirements of 40 CFR 63 Subpart JJJJ.

- i. Determine the organic HAP or volatile matter and coating solids content of coating materials according to procedures in 40 CFR 63.3360(c) and (d). If applicable, determine the mass of volatile matter retained in the coated web or otherwise not emitted to the atmosphere according to 40 CFR 63.3360(g) [40 CFR 63.3360(a)(1)].
- ii. Conduct a performance test for each capture and control system (PTE and RTO) to determine: the destruction or removal efficiency of each control device other than solvent recovery according to 40 CFR 63.3360(e), and the capture efficiency of each capture system according to 40 CFR 63.3360(f). If applicable, determine the mass of volatile matter retained in the coated web or otherwise not emitted to the atmosphere according to 40 CFR 63.3360(g) [40 CFR 63.3360(a)(2)].
- iii. Conduct a performance test to establish the operating limits of the RTO according to 40 CFR 63.3360(e)(3)(i)(A) and (B) pursuant to [40 CFR 63.3360(e)(3)(i)].

7.1.8 Monitoring Requirements

a. Compliance Assurance Monitoring (CAM) Requirements

The affected Coater/Laminators are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 3, Table 3.1 pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application.

- b. The following monitoring methods must be used to determine compliance with monitoring requirements of 40 CFR 63 Subpart JJJJ.
 - i. Record parameters related to possible exhaust flow bypass of control device and to coating use [40 CFR 63.3350(c)].
 - ii. Operate a continuous parameter monitoring system for the RTO according to 40 CFR 63.3350(e) [40 CFR 63.3350(a)(3)].
 - iii. Develop a Capture System Monitoring Plan according to 40 CFR 63.3350(f) [40 CFR 63.3350(a)(4)].
 - iv. Monitor the RTO operating parameters according to the Capture System Monitoring Plan developed per Condition 7.1.8(b)(iii) [40 CFR 63.3350(f)(3)].

7.1.9 Records keeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for each affected Coater/Laminator to demonstrate compliance with Conditions 5.6.1 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The owner or operator of an affected Coater/Laminator shall collect and record all of the following information each day for each affected Coater/Laminator and maintain the information at the source for a period of three years [35 IAC 218.211(e)(2)].
 - i. Control device monitoring data.
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated coating line.
 - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- b. The owner or operator shall maintain a log of operating time of when compliant coatings are used and when the RTO is shutdown.
- c. The name and identification number of each coating and cleanup solvent used.
- d. The VOM content (lb VOM/gal) of each coating complying with 35 IAC 218.204.
- e. The VOM content (wt %) and HAP content (wt %) of each coating and cleanup solvent used.
- f. Usage of each coating and cleanup solvent (T/mo).
- g. VOM containing waste collected (T/mo).
- h. The VOM content of each of the VOM containing waste collected, as determined in accordance with Condition 7.1.7(e) (wt %).
- i. VOM emissions calculated in accordance with the procedures given in Condition 7.1.12 (T/mo and T/yr).
- j. The capture efficiency protocol submitted to the Illinois EPA and the USEPA. A copy of the results must be kept on file with the source for a period of three years [35 IAC 218.105(c)(3)(A)].

- k. Records as specified in 40 CFR 63.3410(a)(1)(ii)(v) and (vi) and (a)(2) [40 CFR 63.3410(a)(1)].

7.1.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of an affected Coater/Laminator with the permit requirements within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

- b. Reporting of Compliance Assurance Monitoring (CAM)

The Permittee shall submit monitoring reports to the Illinois EPA in accordance with Condition 8.6.1 and shall include, at a minimum, the information required under Condition 8.6.1 and the following information [40 CFR 64.6(c)(3), 64.9(a)(1), and (2)]:

- i. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken [40 CFR 64.6(c)(3) and 64.9(a)(2)(i)]; and
- ii. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks [40 CFR 64.6(c)(3) and 64.9(a)(2)(ii)].

- c. Reporting for 40 CFR 63 Subpart JJJJ

The Permittee must submit reports as specified in 40 CFR 63.3400(b) through (g) [40 CFR 63.3400(a)].

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected Coater/Laminator without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the coatings or cleaning solutions used, provided the affected Coater/Laminators continue to comply with the Conditions in Section 7.1 of this permit.

7.1.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is addressed by the work-practices inherent in the operation of an affected Coater/Laminator.
- b. Compliance with the VOM usage limitations in this section is addressed by the testing requirements of Condition 7.1.7, and the recordkeeping requirements of Condition 7.1.9(d), (e), and (f).
- c. Compliance with Conditions 5.6.1 and 7.1.6 VOM emissions from the affected Coater/Laminators is addressed by the testing requirements of Condition 7.1.7, the monitoring requirements of Condition 7.1.8, the recordkeeping requirements of Condition 7.1.9, and shall be calculated based on the formulas listed below:

$$E_T = E_1 + E_2 - E_3$$

Where:

E_T = Total VOM Emissions (T/mo)

$$U_v = U_1 \times V_1$$

Where:

U_v = Coating VOM Usage (tons/month)

U_1 = Coating Usage (tons/month)

V_1 = Coating VOM Content (wt%)

$$E_1 = U_v (\eta/100) [1 - (\epsilon/100)]$$

Where:

E_1 = Coating VOM Emissions (tons/month)

U_v = Coating VOM Usage (T/mo)

η = Capture Efficiency (100%)*

ϵ = Control Efficiency (95%)*

* Based upon most recent stack test.

$$E_2 = U_2 \times V_2$$

Where:

E_2 = Cleanup Solvent VOM Emissions (T/mo)

U_2 = Cleanup Solvent Usage (T/mo)

V_2 = Cleanup Solvent VOM Content (wt %)

$$E_3 = C_3 \times V_3$$

Where:

E_3 = VOM Containing Waste Credit (T/mo)

C_3 = VOM Containing Waste Collected (T/mo)

V_3 = VOM Containing Waste VOM Content (wt %)*

* As measured in accordance with Condition 7.1.7(b).

- d. Compliance with Condition 7.1.5(c) shall be demonstrated by:
 - i. Collecting the combustion temperature data according to 40 CFR 63.3350(e) (9);
 - ii. Reducing the data to 3-hour block averages; and
 - iii. Maintaining the 3-hour average combustion temperature at or above the temperature limit.
- e. Compliance with Condition 7.1.6 (e) (i) shall be demonstrated by the test requirements of Condition 7.1.7(f), the monitoring requirements of Condition 7.1.8(b), the recordkeeping requirements of Condition 7.1.9(k), the reporting requirements of Condition 7.1.10, and by following the procedures set out in 40 CFR 63.3370(c) (1). Use either Equation 1a or b of 40 CFR 63.3370 to determine compliance with 40 CFR 63.3320(b) (2) in accordance with 40 CFR 63.3370(c) (5) (i).
- f. Compliance with Condition 7.1.6 (e) (ii) shall be demonstrated by the test requirements of Condition 7.1.7(f), the monitoring requirements of Condition 7.1.8(b), the recordkeeping requirements of Condition 7.1.9(k), the reporting requirements of Condition 7.1.10, and by following the procedures set out in 40 CFR 63.3370(c) (2). Use Equations 2 and 3 of 40 CFR 63.3370 to determine compliance with 40 CFR 63.3320(b) (3) in accordance with 40 CFR 63.3370(c) (5) (i).
- g. Compliance with Condition 7.1.6 (e) (iii) shall be demonstrated by the test requirements of Condition 7.1.7(f), the monitoring requirements of Condition 7.1.8(b), the recordkeeping requirements of Condition 7.1.9(k), the reporting requirements of Condition 7.1.10, and by following the procedures set out in 40 CFR 63.3370(c) (3). Use Equations 4 of 40 CFR 63.3370 to

determine compliance with 40 CFR 63.3320(b)(2) in accordance with 40 CFR 63.3370(c)(5)(ii).

- h. Compliance with Condition 7.1.6 (e)(iv) shall be demonstrated by the test requirements of Condition 7.1.7(f), the monitoring requirements of Condition 7.1.8(b), the recordkeeping requirements of Condition 7.1.9(k), the reporting requirements of Condition 7.1.10, and by following the procedures set out in 40 CFR 63.3370(c)(4). Use Equations 5 of 40 CFR 63.3370 to determine compliance with 40 CFR 63.3320(b)(3) in accordance with 40 CFR 63.3370(c)(5)(ii).
- i. Compliance with Condition 7.1.6 (e)(v) shall be demonstrated by the test requirements of Condition 7.1.7(f), the monitoring requirements of Condition 7.1.8(b), the recordkeeping requirements of Condition 7.1.9(k), the reporting requirements of Condition 7.1.10, and by following the procedures set out in 40 CFR 63.3370(d). Use Equations 6 of 40 CFR 63.3370 to determine that total monthly HAP applied is less than the calculated equivalent allowable organic HAP (Equation 13a or b of 40 CFR 63.3370).
- j. Compliance with Condition 7.1.6 (e)(vi) shall be demonstrated by the monitoring requirements of Condition 7.1.8, the recordkeeping requirements of Condition 7.1.9(k), the reporting requirements of Condition 7.1.10, and by following the procedures set out in 40 CFR 63.3370(e) to determine compliance according to 40 CFR 63.3370(k).
- k. Compliance with Condition 7.1.6 (e)(vii) shall be demonstrated by the monitoring requirements of Condition 7.1.8, the recordkeeping requirements of Condition 7.1.9(k), the reporting requirements of Condition 7.1.10, and as follows:
 - i. Collect the combustion temperature data according to 40 CFR 63.3350(e)(9); and
 - ii. Reduce the data to 3-hour block averages; and
 - iii. Maintain the 3-hour average combustion temperature at or above the temperature limit.

7.2 Unit 02 - Extruder/Laminator and Coater
Control - None

7.2.1 Description

The Extruder/Laminator and Coater are used to coat flexible coating and composite materials. The Extruder/Laminator and the Coater each has a gas fired dryer. VOM emissions result from the use of solvent based materials.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
02 Extruder/ Laminator and Coater	Millennium Extruder/ Laminator	12/97	None
	ROTO Rotogravure Coater/Printing Press in coater mode	01/82	

7.2.3 Applicable Provisions and Regulations

- a. The "affected Extruder/Laminator and Coater" for the purpose of these unit-specific conditions, is the Extruder/Laminator and Coater described in Conditions 7.2.1 and 7.2.2.
- b.
 - i. The "affected Extruder/Laminator and Coater" are subject to the emission limits identified in Condition 5.3.2.
 - ii. The "affected Extruder/Laminator and Coater" is subject to 35 IAC 212.321(a), which provides that:

 No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].
- c. The affected "Extruder/Laminator" is subject to the following:
 - i. No owner or operator of an affected Extruder/Laminator shall apply coatings on the affected Extruder/Laminator, during any day, whose whole daily-weighted average VOM content exceeds the emission limitations for paper 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 [35 IAC 218.204(c) and 218.205(a)]:

kg/liter	lb/gallon
0.28	2.3

- d. The "affected Extruder/Laminator and Coater" are subject 40 CFR 63 Subpart JJJJ - NESHAP: Paper and Other Web Coating because the source is a major source for HAP emissions as defined in 40 CFR 63.2, at which web coating lines are operated [40 CFR 63.3290].

7.2.4 Non-Applicability of Regulations of Concern

- a. The "affected Extruder/Laminator and Coater" are not subject to 35 IAC 218.301, because the affected Extruder/Laminator and Coater are excluded from these requirements pursuant to 35 IAC 218.209.
- b. The "affected Extruder/Laminator and Coater" are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected Extruder/Laminator and Coater do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.2.5 Control Requirements and Work Practices

Control requirements are not set for the affected Extruder/Laminator and Coater. There may be requirements for source-wide control requirements set forth in Condition 5.5.

7.2.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected Extruder/Laminator and Coater are subject to the following:

- a. The affected Extruder Laminator shall not exceed 25.3 tons per year of VOM usage. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). This limit was established in Permit 97090007 [T1].
- b. VOM emissions from the affected Extruder Laminator shall not exceed 24.9 tons per year. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). These limits were established in Permit 97090007 [T1].

- c. The above limitations were established in Permit 97090007, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].
- d. The affected Extruder/Laminator and Coater must comply with HAP emission standards of 40 CFR 63.3320(b) and (c) as follows:
 - i. Each coating material used shall not exceed 0.04 kg HAP/kg coating material as purchased, pursuant to 40 CFR 63.3370(a)(1)(i).
 - ii. Each coating material used shall not exceed 0.2 kg HAP/kg coating solids as purchased, pursuant to 40 CFR 63.3370(a)(1)(ii).
 - iii. Each coating material used shall not exceed 0.04 kg HAP/kg coating material as applied, pursuant to 40 CFR 63.3370(a)(2)(i).
 - iv. Each coating material used shall not exceed 0.2 kg HAP/kg coating solids as applied, pursuant to 40 CFR 63.3370(a)(2)(ii).
 - v. The monthly average of all coating materials used shall not exceed 0.04 kg HAP/kg coating material as applied on a monthly basis as applied, pursuant to 40 CFR 63.3370(a)(2)(iii).
 - vi. The monthly average of all coating materials used shall not exceed 0.2 kg HAP/kg coating solids as applied on a monthly basis as applied, pursuant to 40 CFR 63.3370(a)(2)(iv).
 - vii. The total monthly HAP applied shall not exceed the calculated allowable limit, pursuant to 40 CFR 63.3370(a)(3).
 - viii. The above limitations are being established in this permit. The "affected Extruder/Laminator and Coater" are subject to 40 CFR 63 Subpart JJJJ - NESHAP: Paper and Other Web Coating. The Source has requested these limits to comply with the HAP emission limits of 40 CFR 63 Subpart JJJJ. [T1N]
 - ix. Compliance with the above annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) pursuant to Section 39.5(7)(b) of The Act. [T1N]

7.2.7 Testing Requirements

- a. The VOM content of each coating used in each affected Extruder/Laminator and Coater shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105. The applicable analytical methods specified below shall be used to determine the composition of coatings as applied:

Method 24 of 40 CFR 60, Appendix A, shall be used to determine the VOM content and density of coatings. If it is demonstrated to the satisfaction of the Illinois EPA and the USEPA that plant coating formulation data are equivalent to Method 24 results, formulation data may be used. In the event of any inconsistency between a Method 24 test and a source's formulation data, the Method 24 test will govern [35 IAC 218.105(a)].

- b. The percent concentration of solvent in the VOM containing waste from each affected Extruder/Laminator and Coater shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.
- c. The following test methods must be used to determine compliance with test requirements of 40 CFR 63 Subpart JJJJ.

Determine the organic HAP or volatile matter and coating solids content of coating materials according to procedures in 40 CFR 63.3360(c) and (d). If applicable, determine the mass of volatile matter retained in the coated web or otherwise not emitted to the atmosphere according to 40 CFR 63.3360(g) [40 CFR 63.3360(a)(1)].

7.2.8 Monitoring Requirements

Monitoring requirements are not set for the affected Extruder/Laminator and Coater. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected Extruder/Laminator and Coater to demonstrate compliance with Conditions 5.6.1 and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall collect and record all of the following information each day for the affected Extruder/Laminator and

Coater and maintain the information at the source for a period of three years [35 IAC 218.211(d)(2)]:

- i. The name and identification number of each coating used on the affected Extruder/Laminator and Coater.
 - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the affected Extruder/Laminator and Coater.
 - iii. The daily-weighted average VOM content of all coatings as applied on the affected Extruder/Laminator and Coater.
- b. The Permittee shall collect and record all of the following information each day, as summarized on a weekly basis, for the affected Extruder/Laminator and Coater and maintain the information at the source for a period of three years:
- i. Coating and cleanup solvent usage (lb/day).
 - ii. VOM content (wt%) of each coating and cleanup solvent used.
- c. Solvent reclaimed or disposed of (T/mo).
- d. VOM content (wt%) of VOM containing waste disposed of or recycled as determined by the testing procedures in Condition 7.2.7.
- e. VOM emissions calculated in accordance with the procedures given in Condition 7.2.12 (lb/day and T/yr).
- f. The Permittee shall collect and record all of the following information each day for the affected Extruder/Laminator and Coater and maintain the information for at least 5 year following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Pursuant to 40 CFR 63.10(b).
- i. The organic HAP or volatile matter and coating solids content of coating materials determined according to procedures in 40 CFR 63.3360(c) and (d).
 - ii. If applicable, the mass of volatile matter retained in the coated web or otherwise not emitted to the atmosphere according to 40 CFR 63.3360(g).

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected Extruder/Laminator and Coater with the permit requirements as follows within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Upon changing the method of compliance of the Extruder/Laminator and Coater, the Permittee shall certify to the Illinois EPA that the laminator will be in compliance with 35 IAC 218.205. Such certification shall include [35 IAC 218.211(d)(1)]:
 - i. The name and identification number of each coating line which will comply by means of 35 IAC 218.205.
 - ii. The name and identification number of each coating as applied on each Extruder/Laminator and Coater.
 - iii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each Extruder/Laminator and Coater.
 - iv. The instrument or method by which the Permittee will accurately measure or calculate the volume of each coating as applied each day on each Extruder/Laminator and Coater.
 - v. The method by which the Permittee will create and maintain records each day as required in Condition 5(a)(iii).
 - vi. An example of the format in which the records required in Condition 5(a)(iii) will be kept.
- b. The Permittee shall notify the Illinois EPA in the following instances:
 - i. Emissions of VOM from the affected Extruder/Laminator and Coater in excess of the limits specified in Condition 5.6.1 and 7.2.6.
 - ii. Any record showing violation of 35 IAC 218.205 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.211(d)(3)(A)].
 - iii. At least 30 calendar days before changing the method of compliance from 35 IAC 218.205 to 218.204 or 218.207, the Permittee shall comply with all

requirements of 35 IAC 218.211(c) (1) or (e) (1), respectively. Upon changing the method of compliance from 35 IAC 218.205 to 218.204 or 218.207, the Permittee shall comply with all requirements of 35 IAC 218.211 (c) or (e), respectively [35 IAC 218.211(d) (3) (B)].

c. Reporting for 40 CFR 63 Subpart JJJJ

The Permittee must submit reports as specified in 40 CFR 63.3400(b) through 40 CFR 63.3400(c) (2) (v) (B) pursuant to 40 CFR 63.3400(a).

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected Extruder/Laminator and Coater without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the coatings or cleaning solutions used, provided the affected Extruder/Laminator and Coater continues to comply with the Conditions in Section 7.2 of this permit.

7.2.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is addressed by the work-practices inherent in the operation of an affected Extruder/Laminator and Coater.
- b. Compliance with the VOM usage limitations in this section is addressed by the testing requirements of condition 7.2.7, and the recordkeeping requirements of condition 7.2.9(a).
- c. Compliance with Conditions 5.6.1 and 7.2.6 VOM emissions from the affected Extruder/Laminator and Coater is addressed by the testing requirements of condition 7.2.7, and the recordkeeping requirements of condition 7.2.9.
- d. The following formula shall be used to calculate the daily-weighted average VOM content of all coatings as applied on the affected Extruder/Laminator and Coater [35 IAC 211.1670]:

$$\text{VOM}_w = \left[\sum_{i=1}^n V_i C_i \right] / V_T$$

Where:

- VOM_w = The average VOM content of two or more coatings as applied each day on the laminator in units of kg VOM/l (lbs VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM)
- n = The number of different coatings as applied each day on the laminator and Coater
- V_i = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the laminator and Coater in units of l (gal)
- C_i = The VOM content of each coating as applied each day on the laminator in units of kg VOM/l (lbs VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM)
- V_T = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the laminator and Coater in units of l (gal)

- e. Compliance with Condition 7.2.6 (d) (i) shall be demonstrated by the test requirements of Condition 7.2.7(c), the recordkeeping requirements of Condition 7.2.9(f), the reporting requirements of Condition 7.2.10(c), and by following the procedures set out in 40 CFR 63.3370(b).
- f. Compliance with Condition 7.1.6 (d) (ii) shall be demonstrated by the test requirements of Condition 7.2.7(c), the recordkeeping requirements of Condition 7.2.9(f), the reporting requirements of Condition 7.2.10(c), and by following the procedures set out in 40 CFR 63.3370(b).
- g. Compliance with Condition 7.2.6 (d) (iii) shall be demonstrated by the test requirements of Condition 7.2.7(c), the recordkeeping requirements of Condition 7.2.9(f), the reporting requirements of Condition 7.2.10(c), and by following the procedures set out in 40 CFR 63.3370(c) (1). Use either Equation 1a or b of 40 CFR 63.3370 to determine compliance with 40 CFR 63.3320(b) (2) in accordance with 40 CFR 63.3370(c) (5) (i).
- h. Compliance with Condition 7.2.6 (d) (iv) shall be demonstrated by the test requirements of Condition

7.2.7(c), the recordkeeping requirements of Condition 7.2.9(f), the reporting requirements of Condition 7.2.10(c), and by following the procedures set out in 40 CFR 63.3370(c) (2). Use Equations 2 and 3 of 40 CFR 63.3370 to determine compliance with 40 CFR 63.3320(b) (3) in accordance with 40 CFR 63.3370(c) (5) (i).

- i. Compliance with Condition 7.2.6 (d) (v) shall be demonstrated by the test requirements of Condition 7.2.7(c), the recordkeeping requirements of Condition 7.2.9(f), the reporting requirements of Condition 7.2.10(c), and by following the procedures set out in 40 CFR 63.3370(c) (3). Use Equations 4 of 40 CFR 63.3370 to determine compliance with 40 CFR 63.3320(b) (2) in accordance with 40 CFR 63.3370(c) (5) (ii).
- j. Compliance with Condition 7.2.6 (d) (vi) shall be demonstrated by the test requirements of Condition 7.2.7(c), the recordkeeping requirements of Condition 7.2.9(f), the reporting requirements of Condition 7.2.10(c), and by following the procedures set out in 40 CFR 63.3370(c) (4). Use Equations 5 of 40 CFR 63.3370 to determine compliance with 40 CFR 63.3320(b) (3) in accordance with 40 CFR 63.3370(c) (5) (ii).
- k. Compliance with Condition 7.2.6 (d) (vii) shall be demonstrated by the test requirements of Condition 7.2.7(c), the recordkeeping requirements of Condition 7.2.9c (f), the reporting requirements of Condition 7.2.10(c), and by following the procedures set out in 40 CFR 63.3370(d). Use Equations 6 of 40 CFR 63.3370 to determine that total monthly HAP applied is less than the calculated equivalent allowable organic HAP (Equation 13a or b of 40 CFR 63.3370).

7.3 Unit 03 - Printing Presses
Control - None

7.3.1 Description

Four flexographic printing presses and one rotogravure Coater/printing press are used to print on films, foils, paper, and composite materials, using water-based and solvent-based inks. This equipment is also used to apply overlacquers, primers, and coatings. The printing is a continuous process performed on rollstock. Each printing press has a natural gas fired dryer to dry the inks, with the exception of the Ashton printing press which has an electric dryer. VOM emissions result from the use of solvent based materials.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
03 Printing Presses	ROTO Rotogravure Coater/Printing Press in Printing Mode	1/82	None
	660 Kidder Flexographic Printing Press	2/82	
	434 Kidder Flexographic Printing Press	3/82	
	Heinrich Flexographic Printing Press	4/82	
	Ashton Flexographic Printing Press	5/82	

7.3.3 Applicable Provisions and Regulations

- a. The "affected Printing Presses" for the purpose of these unit-specific conditions, are Printing Presses described in Conditions 7.3.1 and 7.3.2.
- b. Applicable Emission Limits
 - i. Each affected printing presses are subject to the emission limits identified in Condition 5.3.2.
 - ii. Each affected printing press is subject to 35 IAC 212.321(a), which provides that:
 - A. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises,

exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- iii. The owner or operator shall not cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from the each affected ink mixing tank. If no odor nuisance exists this limitation shall apply only to photochemically reactive material [35 IAC 218.301].
- iv. The affected printing presses are subject to 40 CFR 63 Subpart KK - NESHAP for the Printing and Publishing Industry, because the source is a major source of HAP, as defined in 40 CFR Part 63.2, at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated. Each product and packaging rotogravure or wide-web flexographic printing press at a source that is a major source of HAP, as defined in 40 CFR Part 63.2, that complies with the following criteria on and after May 30, 1999 is subject only to the requirements of 40 CFR 63.829(e) and 63.830(b) (1) [40 CFR 63.821(b)]:

The owner or operator of the source shall apply no more than 400 kg/mo, for every month, of organic HAP on product and packaging rotogravure or wide-web flexographic printing lines [40 CFR 63.821(b) (2)].

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected printing presses are not subject to 35 IAC 218.204(c), because the affected printing presses comply with emission limitations in 35.IAC 218.401 [35.218.204(c)].
- b. The affected printing presses are not subject to 35 IAC 218.401, Flexographic and Rotogravure Printing, since the flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing line(s)) at the source have a potential to emit less than 22.7 Mg (25 tons) VOM per year [35 IAC 218.402(a) (2)].
- c. This permit is issued based on the affected printing presses not being subject to 40 CFR 60, Subpart QQ - Standards for Performance for the Graphic Arts Industry: Publication Rotogravure Printing, because the affected printing presses are not publication rotogravure printing presses.
- d. This permit is issued based on the affected printing presses not being subject to 40 CFR 60, Subpart FFF -

Standards of Performance for Flexible Vinyl and Urethane Coating and Printing, because the affected printing presses are not used to coat flexible vinyl or urethane products which excludes flexible packaging.

- e. The affected printing presses are not subject to 40 CFR Part 63, Subpart JJJJ, because the affected printing presses are subject to 40 CFR 63 Subpart KK, and are therefore excluded from 40 CFR Part 63, Subpart JJJJ pursuant to 40 CFR 63.3300(a).
- f. The affected printing presses are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected printing presses do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.3.5 Control Requirements and Work Practices

Control requirements are not set for the affected printing presses. There may be requirements for source-wide control requirements set forth in Condition 5.5.

7.3.6 Production and Emission Limitations

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

- i. Production and Emissions from the affected printing presses shall not exceed the following limits:

<u>VOM Usage</u> <u>(tons/year)</u>	<u>VOM Emissions</u> <u>(tons/year)</u>
24.9	24.9

- ii. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].
- iii. The above limitations were established in Permit 95090106. These limits ensure that the affected Printing Presses are not subject to the control requirements of 35 IAC Part 218, Subpart H: Printing And Publishing [T1].

7.3.7 Testing Requirements

- a. The VOM content of each coating, ink, and cleanup solvent shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 as specified below:

- i. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used; provided, however, Method 24, shall be used to demonstrate compliance; or
 - ii. The manufacturer's specifications for VOM contents 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 IAC 218.105(a); provided, however, Method 24 shall be used to determine compliance.
- b. The percent concentration of solvent in the VOM containing waste from the affected printing press shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

7.3.8 Monitoring Requirements

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

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for each affected Printing Press to demonstrate compliance with Conditions 5.6.1 and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The name and identification number of each coating and ink "as applied" on each printing line [35 IAC 218.404(b)(2)(A)].
- b. The VOM content (wt%) and volume (lb/day) of each coating and ink as applied each year on each printing line [35 IAC 218.404(b)(2)(B)].
- c. The name and identification number of each cleanup solvent used.
- d. The VOM content (wt %) and volume (lb/day) of each cleanup solvent used.
- e. VOM containing waste collected (lb/day).
- f. The VOM content of the VOM containing waste collected, as determined in accordance with Condition 7.3.7 (wt %).
- g. VOM emissions calculated in accordance with the procedures given in Condition 7.3.12 (T/day and T/yr).

- h. The owner or operator of a source which meets the limits and criteria of 40 CFR 63.821(b) (2) shall maintain records as required below. Owners or operators shall maintain these records for five years, and upon request, submit them to the Illinois EPA or the USEPA [40 CFR 63.829(e)].

The owner or operator shall maintain records of the total volume and organic HAP content of each material applied on product and packaging rotogravure or wide-web flexographic printing presses during each month.

7.3.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of an affected Printing Press with the permit requirements as follows within 30 days, pursuant to Section 39.5(7) (f) (ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:
 - i. Emissions of VOM from the affected Printing presses in excess of the limits specified in Condition 5.6.1 and 7.3.6 based on the current day's records plus the preceding 364 days within 30 days of such an occurrence.
 - ii. The owner or operator of a flexographic and rotogravure Printing Press line exempted from the limitations of 35 IAC 218.401 because of the criteria in 35 IAC 218.402 shall notify the Illinois EPA of any record showing that total maximum theoretical emissions of VOM from all printing press lines exceed 90.7 Mg (100 tons) and/or the potential to emit exceeds 22.7 Mg (25 tons) in any calendar year before the application of capture systems and control devices by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs [35 IAC 218.404(b) (3)].

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected Printing Presses without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the inks or cleaning solutions used, provided the affected printing presses continue to comply with the Conditions in Section 7.3 of this permit.

7.3.12 Compliance Procedures

- a. Compliance with the PM limit in Condition 7.3.3(b) (ii) is addressed by the normal work practices inherent in the operation of the affected Printing Presses.
- b. Compliance with the HAP limit in Condition 7.3.3(b) (iii) is addressed by the testing requirements in Condition 7.3.7, the records required in Condition 7.3.9(a) through (g) and the reporting requirements of Condition 7.3.10(a) (i)
- c. Compliance with the VOM emission limits in Conditions 5.6 and 7.3.6(a) (i) are addressed by the testing requirements in Condition 7.3.7, the records required in Condition 7.3.9(a) through (g) the reporting requirements of Condition 7.3.10(a) (i), and the emission factors and formulas listed below:

$$E_T = E_1 + E_2 - E_3$$

Where:

$$E_T = \text{Total VOM Emissions (T/day)}$$

$$E_1 = U_1 \times V_1$$

Where:

$$E_1 = \text{Ink VOM Emissions (T/day)}$$

$$U_1 = \text{Ink Usage (T/day)}$$

$$V_1 = \text{Ink VOM Content (wt\%)}$$

$$E_2 = U_2 \times V_2$$

Where:

$$E_2 = \text{Cleanup Solvent VOM Emissions (T/day)}$$

$$U_2 = \text{Cleanup Solvent Usage (T/day)}$$

$$V_2 = \text{Cleanup Solvent VOM Content (wt\%)}$$

$$E_3 = C_3 \times V_3 \div CD$$

Where:

$$E_3 = \text{VOM Containing Waste Credit (T/day)}$$

$$C_3 = \text{VOM Containing Waste Collected (T/mo)}$$

$$V_3 = \text{VOM Containing Waste VOM Content (wt\%)*}$$

CD = Calendar Days per Month (days/mo)

* As measured in accordance with Condition 7.3.7(b).

7.4 Unit 04 - Fuel Combustion Emission Units
Control - None

7.4.1 Description

The source has several fuel combustion emission units including gas fired ovens and RTO. In addition the source has several insignificant gas fired emission units. Fuel combustion emissions result from the use of natural gas in the above emission units. The Permittee has opted to establish a source wide natural gas usage which includes usage from the insignificant emission units thus eliminating the need to monitor natural gas usage at each emission unit, providing greater flexibility in the monitoring and recordkeeping provisions for natural gas.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
04 Fuel Combustion Emission Units	Ultra-Lam Oven	02/91	None
	GFG Oven	12/68	
	Duoflex Oven	12/70	
	Ultra-Lam, GFG, Duoflex RTO	05/2004	
	Millennium Oven	12/97	
	660 Kidder Oven	02/82	
	434 Kidder Oven	03/82	
	Heinrich Oven	04/82	
Roto Oven	01/82		

7.4.3 Applicable Provisions and Regulations

- a. The "affected Fuel Combustion Emission Units" for the purpose of these unit-specific conditions, are emission units described in Conditions 7.4.1 and 7.4.2.

7.4.4 Non-Applicability of Regulations of Concern

- a. Each affected fuel combustion emission unit is not subject to NSPS, 40 CFR 60, Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units, since each steam generating unit was either constructed, modified, or reconstructed prior to June 9, 1989 and/or has a maximum design heat input capacity of less than 2.9 MW (10 mmBtu/hr).
- b. Each affected fuel combustion emission unit is not subject to 35 IAC 216.121, Fuel Combustion Emission Sources, since the actual heat input from each affected fuel combustion emission unit is less than 2.9 MW (10 mmBtu/hr).
- c. Each affected fuel combustion emission unit is not subject to 35 IAC 217.141, Existing Emission Sources in Major

Metropolitan Areas, since the actual heat input of each affected fuel combustion emission unit is less than 73.2 MW (250 mmBtu/hr).

- d. Each affected fuel combustion emission unit is not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.303, Fuel Combustion Emission Sources, which excludes each affected fuel combustion emission unit from this requirement.

7.4.5 Control Requirements and Work Practices

- a. Natural gas shall be the only fuel fired in the affected fuel combustion emission units [39.5(7) (a) of the Act].

7.4.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source wide emission limitations in Condition 5.6, the affected fuel combustion emission units are subject to the following: [39.5(7) (a) of the Act]

- a. Operation of the affected fuel combustion emission units shall not exceed the following limits:

Natural Gas Usage	
mmtherms/mo	mmtherms/yr
0.15	1.73

- b. Emissions of the affected fuel combustion emission units shall not exceed the following limits:

Pollutant	Emissions	
	(T/mo)	(T/yr)
NO _x	0.72	8.63
PM	0.097	1.16
SO ₂	0.006	0.068
VOM	0.013	0.16

These limits are based upon the maximum natural gas usage determined from the maximum firing rate at the maximum operating hours (8,760 hr/yr) and standard emission factors as detailed in Condition 7.4.12.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 95090106, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the

aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21. In addition, the above limitations contain revisions to previously issued Permit 97090007, as reflected in this Title V permit issued on October 1, 1999. Specifically, the information in the CAAPP application contains the most current and accurate information for the Source [T1].

7.4.7 Testing Requirements

Testing requirements are not set for the affected Fuel Combustion Emission Units. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.4.8 Monitoring Requirements

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

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected Fuel Combustion Emission Units to demonstrate compliance with Conditions 5.6.1 and 7.4.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Fuel usage (mmtherms/mo); and
- b. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.4.12 (T/mo).

7.4.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected Fuel Combustion Units with the permit requirements as follows within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:
 - i. Fuel usage (mmtherms/mo); and
 - ii. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.4.12 (T/mo).

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

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

7.4.12 Compliance Procedures

a. Compliance with the emission limits in Conditions 5.6 and 7.4.6(a) and (b) is addressed by the records required in Conditions 7.4.9(a) and (b) and the emission factors and formulas listed below:

i. Emission factors for the affected Fuel Combustion Emission Units:

<u>Pollutant</u>	<u>Emission Factors</u> <u>(lb/mmscf)</u>
VOM	5.5
PM	7.6
SO ₂	0.6
NO _x	100

These are the emission factors for NO_x, PM, SO₂, and VOM for uncontrolled natural gas combustion in commercial boilers (0.3 - < 100 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, July, 1998.

$$E = U \times F \times (0.05)^*$$

Where:

E = Emissions per Pollutant (T/mo)

U = Natural Gas Usage (mmtherms/mo)

F = Pollutant Emission Factor (lbs/mmcsf)

* Based upon the following conversion factors:

2,000 lb/ton

1,000 Btu/ft³

1 Therm/100,000 Btu

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

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

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

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

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

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

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

8.5 Testing Procedures

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

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

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

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

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

8.6.2 Test Notifications

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

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

8.6.3 Test Reports

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

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

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

8.6.4 Reporting Addresses

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

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

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

iii. Illinois EPA - Air Regional Field Office

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

iv. USEPA Region 5 - Air Branch

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

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

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

8.7 Title I Conditions

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

practices, or operations regulated or required under this permit;

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

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

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

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

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

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

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

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

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

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

9.15 General Authority for the Terms and Conditions of this Permit

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

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

10.0 ATTACHMENTS

Attachment 1 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

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

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

Where:

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

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

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

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

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

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

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

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

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

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

Where:

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

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

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

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

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

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

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

Attachment 3 Compliance Assurance Monitoring (CAM) Plans

Table 3.1	PSEU Designation:	Ultra-Lam, GFG, and Duoflex (RTO)
	Significant Emission Unit Section:	7.1
	Pollutant:	VOM

Indicators:	#1: Chamber Temperature	#2: Workplace-Inspections
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GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Continuously record the chamber temperature of the oxidizer	Inspect internal and external structure integrity of oxidizer to ensure proper operation. Inspect burner operation, and tune as necessary.
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	An excursion is identified as a measurement of 50°F less than the set point temperature demonstrated during the most recent compliance test	A finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	If the inlet temperature drops below the 50°F threshold, an assessment of the problem, corrective action, and reporting will be triggered.	N/A

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Temperature monitoring devices are accurate within 0.5% of the temperature measured, or +/-5°F, whichever is greater. The location of the thermocouple is at the oxidizer combustion zone.	Inspection of the oxidizer system will identify problems.
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Temperature data is recorded on electronic media.	Inspection records
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Validation of temperature monitoring system is conducted annually.	N/A
THE MONITORING FREQUENCY:	Temperature data is measured continuously.	External, internal, and burner assembly inspections are to be conducted quarterly.
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Temperature data is recorded at least every 15 minutes on electronic media.	Record results of inspections and observations.
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	The temperature data averaging period is 3.0 hour	N/A

Table 3.1 (Continued)	PSEU Designation:	Ultra-Lam, GFG, and Duoflex (RTO)
Significant Emission Unit Section:		7.1
	Pollutant:	VOM

Indicators:

#3: Bypass Interlock	#4: Performance Test
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GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Verify operational condition of control device bypass interlocks	Conduct emissions test to demonstrate compliance with permitted destruction efficiency
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	Inspect and verify the operational condition of the bypass interlock system	Permitted control device destruction efficiency
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	If the interlock system is found to be inoperable, the process will be shut down, an assessment of the problem, corrective action and reporting will be triggered	A finding that the control device destruction efficiency is below the value established in the permit will trigger an assessment of the problems, corrective action and report

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Inspection of the interlock system conducted annually	A test protocol shall be prepared and approved by the regulatory Agency prior to conduction of the performance test
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Inspection reports	Not applicable
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Not applicable	EPA test methods approved in protocol
THE MONITORING FREQUENCY:	Annually	Once every 5 years
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Record results of interlock operation, verification, inspections and observations	Per approved test method
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Not applicable	Not applicable

Table 3.2	PSEU Designation:	Ultra-Lam (PTE)
	Significant Emission Unit Section:	7.2
	Pollutant:	VOM

Indicators:

#1: Work practice	#2: Work practice
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GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure	Inspect operational condition of all bypass interlocks
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	Properly position dampers, leak-free enclosure of the process will assure that all of the exhaust will reach the control device.	Inspect and verify the operational condition of the bypass interlock system
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	Not applicable	Not applicable

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Inspection of dampers, ductwork, and enclosure will identify problems	Inspection of the interlock system will identify problems
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Inspection records	Inspection records
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Not applicable	Not applicable
THE MONITORING FREQUENCY:	Semi-annually	Annually
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Record results of inspections and observations	Record results of interlock operation, verification, inspections and observations
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Not applicable	Not applicable

Table 3.2 (Continued)	PSEU Designation:	Ultra-Lam (PTE)
Significant Emission Unit Section:		7.2
	Pollutant:	VOM

Indicators:

#3: Pressure Differential	
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GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Monitor pressure differential across the enclosure wall and the surrounding atmosphere	
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	A pressure differential of less than negative (-) 0.007" w.c. for 5 consecutive minutes; alternatively, a smaller differential can be used as the indicator if such a differential is demonstrated as adequate to qualify the PTE during the performance test	
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	If the pressure differential is less than the value established, an assessment of the problem, corrective action and reporting will be triggered	

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres.	
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Not applicable	
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Validation of instrument calibrations conducted annually. Compare to calibrated meter or manometer, or calibrate using pressure standard	
THE MONITORING FREQUENCY:	Monitor continuously	
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Record continuously on electronic media	
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	None taken	

Table 3.3	PSEU Designation:	GFG and Duoflex (PTE)
	Significant Emission Unit Section:	7.3
	Pollutant:	VOM

Indicators:

#1: Work practice	#2: Work practice
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GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure	Inspect operational condition of all bypass interlocks
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	Properly positioned dampers, leak-free ductwork and a leak-free enclosure of the process will assure that all of the exhaust will reach the control device.	Inspect and verify the operational condition of the bypass interlock system
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	Not applicable	Not applicable

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Inspection of dampers, ductwork, and enclosure will identify problems	Inspection of the interlock system will identify problems
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Inspection records	Inspection records
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Not applicable	Not applicable
THE MONITORING FREQUENCY:	Semi-annually	Annually
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Record results of inspections and observations	Record results of interlock operation, verification, inspections and observations
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Not applicable	Not applicable

Table 3.3 (Continued)	PSEU Designation:	GFG and Duoflex(PTE)
Significant Emission Unit Section:		7.3
	Pollutant:	VOM

Indicators:

#3: Pressure Differential

GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Monitor pressure differential across the enclosure wall and the surrounding atmosphere	
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	A pressure differential of less than negative (-) 0.007" w.c. for 5 consecutive minutes, alternatively, a smaller differential can be used as the indicator if such a differential is demonstrated as adequate to qualify the PTE during the performance test.	
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	If the pressure differential is less than the value established, an assessment of the problem, corrective action and reporting will be triggered	

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres	
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Not applicable	
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Validation of instrument calibrations conducted annually. Compare to calibrated meter or manometer, or calibrate using pressure standard	
THE MONITORING FREQUENCY:	Monitor continuously	
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Record continuously on electronic media	
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	None taken	

Attachment 4 Guidance

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

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

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

www.epa.state.il.us/air/caapp/index.html

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

www.epa.state.il.us/air/caapp/199-caapp.pdf

www.epa.state.il.us/air/permits/197-fee.pdf

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