

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

MeadWestvaco Consumer Packaging Group LLC
d/b/a AGI Media
Attn: Mr. Richard J. Lisac
200 Capitol Way
Jacksonville, Illinois 62650

Application No.: 07040044

I.D. No.: 137020ADG

Applicant's Designation:

Date Received: November 6, 2008

Subject: Lithographic Printing

Date Issued: December 19, 2008

Expiration Date: August 29, 2013

Location: 200 Capitol Way, Jacksonville, Morgan County

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

Seven (7) Non-Heatset Sheet Fed Offset Lithographic Presses
Plate Room and Gluing Operation

pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons per year for Volatile Organic Material (VOM), and 10 tons/year for any single hazardous air pollutants (HAP) and 25 tons/year for any combination of such HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to initial issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. 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 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.

b. Pursuant to 35 Ill. Adm. Code 212.321(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 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 35 Ill. Adm. Code 212.321(c).

3a. Pursuant to 35 Ill. Adm. Code 215.204(c), no owner or operator of a coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile organic material pursuant to 35 Ill. Adm. Code Part 215, delivered to the coating applicator:

Paper Coating	<u>kg/l</u>	<u>lb/gal</u>
i. All paper coating except as provided in 35 Ill. Adm. Code 215.204(c) (2)	0.35	(2.9)
ii. Specialty High Gloss Catalyzed Coating	0.42	(3.5)

(Note: These limitations shall not apply to equipment used for both printing and paper coating.)

b. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K shall apply only to photochemically reactive material.

4a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

b. The Permittee shall not cause or allow the use of a cleaning solution on the new non-heatset sheetfed offset lithographic presses unless the VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F).

c. The Permittee shall not cause or allow VOM containing cleaning materials, including used cleaning towels, associated with the new non-heatset sheetfed offset lithographic presses to be kept, stored or disposed of in any manner other than in closed containers.

5a. Emissions and operation of the 7 presses shall not exceed the following limits:

<u>Item of Equipment</u>	<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
7 Non-Heatset Sheet-Fed Offset Lithographic Printing Presses Plate Room & Gluing Operation (VOM Usage & Emissions)	15,360	76.8
	<u>440</u>	<u>2.2</u>
Total	15,800	79.0

These limits are based on maximum material usage and the maximum VOM content of these materials. The VOM content of fountain solution, additives, cleanup solvents and all other materials not recovered shall be assumed emitted. A credit of fifty percent VOM retention is given for the use of VOM-containing solvent with solvent vapor pressure less than 10 mmHg at 20°C used on cleaning towels and stored in closed containers and sent off-site. Ninety-five percent of the VOM content of the inks used shall be assumed retained and only five percent emitted. All VOM and HAPs in coatings assumed emitted.

- b. Emissions from 7 presses and the plate room and gluing operation shall be calculated using the following equation:

$$E = \Sigma [C_j * V_j] + 0.05 \Sigma [I_i * V_i] + FS + S + 0.5s - (W * V_w)$$

Where:

E = VOM and HAP emissions (tons);

C_j = Each Coating Used (tons);

V_j = Certified VOM & HAP contents of each coating (wt%);

I_i = Each Ink used (tons);

V_i = Certified VOM content of each ink (wt%);

FS = Fountain solution and additives used (tons);

S = Cleaning solvent used (tons);

0.5s = 50% Cleaning solvent usage where vapor pressure less than 10 mmHg and used cleaning towels stored in closed containers and sent off site (tons);

W = Certified Waste Reclaimed and shipped off-site (tons); and

V_w = Certified VOM & HAP contents in W (weight %).

6. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.99 tons/month and 19.9 tons/year of any combination of such HAPs. As a result of this

condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements to obtain a CAAPP permit from the Illinois EPA or Section 112(g) of the Clean Air Act.

7. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 8a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Conditions 9, 10 and 11 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
9. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.

10. Pursuant to 35 Ill. Adm. Code 215.409, the volatile organic material content of fountain solution and all coatings shall be determined by Method 24, 40 CFR 60, Appendix A. The volatile organic material content of printing inks shall be determined by Method 24A, 40 CFR Part 60, Appendix A. Any alternate test method must be approved by the Illinois EPA, which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative.
- 11a. Testing to demonstrate compliance with the requirements of Condition 3(b) of this permit shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting such testing to allow the Illinois EPA to be present during such testing.
- b. Testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified below:
 - i. If the organic material or solvent consists of only a single compound, the vapor pressure shall be determined by ASTM Method D2879-86 or the vapor pressure may be obtained from a publication such as: Boublik, T., V. Fried and E. Hala, "The Vapor Pressure of Pure Substances," Elsevier Scientific Publishing Co., New York (1973); Perry's Chemical Engineer's Handbook, McGraw-Hill Book Company (1984); CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-87); and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985).
 - ii. If the organic material or solvent is in a mixture made up of both organic material compounds and compounds which are not organic material, the vapor pressure shall be determined by the following equation:

$$P_{om} = \frac{\sum_{i=1}^n P_i X_i}{\sum_{i=1}^n X_i}$$

where:

P_{om} = Total vapor pressure of the portion of the mixture which is composed of organic material;

- n = Number of organic material components in the mixture;
- i = Subscript denoting an individual component;
- P_i = Vapor pressure of an organic material component determined in accordance with Condition 11(b) (i) of this permit;
- X_i = Mole fraction of the organic material component of the total organic mixture.

- iii. If the organic material or solvent is in a mixture made up of only organic material compounds, the vapor pressure shall be determined by ASTM Method D2879-86 or by the above equation.
12. Pursuant to 40 CFR 63.10(b) (3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b) (3) and to record the results of that determination under 40 CFR 63.10(b) (3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
 13. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
 - 14a. The Permittee shall maintain records of the following items for so as to demonstrate compliance with the conditions of this permit:

- i. The names and amounts of inks and coatings used (lbs/month and tons/year) and certified VOM and HAP contents of each (weight %);
- ii. The names and amounts of fountain solutions and additives used (lbs/month and tons/year) and certified VOM and HAP contents of each (weight %);
- iii. The names and amounts of cleanup solvents used (lbs/month and tons/year) and certified VOM and HAP contents of each (weight %);
- iv. Information for each cleaning solution used on each non-heatset sheet-fed offset lithographic printing press:
 - A. For each batch of cleaning solution for which Permittee relies on the vapor pressure of the cleaning solution to demonstrate compliance with Condition 4(b):
 - I. The name and identification of each cleaning solution;
 - II. Date and time of preparation, and each subsequent modification, of the batch;
 - III. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with Condition 11(b) of this permit;
 - IV. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
 - V. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with Condition 12(b) of this permit;
 - B. The date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any;
- v. Certified amount of waste recovered and shipped off-site (lbs/month and tons/year) and certified VOM and HAP contents (weight %);
- vi. The amount of VOM used in plate room and gluing operation (lbs/month and tons/year); and
- vii. Monthly and annual VOM and HAP emissions from the source, with supporting calculations (lbs/month and tons/year).

- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 15. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 16a. If there is an exceedance of or deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance/deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:

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

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

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

It should be noted that this permit has been revised to include operation of equipment described in Construction Permit 08110011.

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If you have any questions on this permit, please contact Randy Solomon at 217/782-2113.

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

Date Signed: _____

ECB:RBS:psj

cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emission Summary

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

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)		
	<u>VOM</u>	Single <u>HAP</u>	Total <u>HAPs</u>
7 Printing Presses	76.8		
Plate Room & Gluing	<u>2.2</u>	----	----
Total:	79.0	<u>7.9</u>	<u>19.9</u>

RBS:psj