

217/782-2113

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

PERMITTEE

Quebecor World Direct - Petty Printing Company
Attn: David A. Warren, Environmental Coordinator
420 West Industrial Avenue
Post Office Box 250
Effingham, Illinois 62401-2834

Application No.: 95080146 I.D. No.: 049025ABO
Applicant's Designation: Date Received: August 31, 1995
Operation of: Commercial Lithographic Printing
Date Issued: November 6, 2002 Expiration Date²: November 6, 2007
Source Location: 420 West Industrial Avenue and 1200 Niccum Avenue,
Effingham, Effingham County
Responsible Official: Dwaine F. Kinderknecht, Vice President/General Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a Commercial Lithographic Printing Operation, 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 Bill Marr at 217/782-2113.

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

DES:WDM:psj

cc: Illinois EPA, FOS, Region 3

1 This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

2 Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Quebecor World Direct - Petty Printing Company
420 West Industrial Avenue and 1200 Niccum Avenue
Effingham, Illinois 62401-2834
217/347-7721

I.D. No.: 049025ABO
SIC: 2752, Commercial Printing, Lithographic

1.2 Owner/Parent Company

Quebecor World Direct - Petty Printing Company
420 West Industrial Avenue
Effingham, Illinois 62401-2834

1.3 Operator

Quebecor World Direct - Petty Printing Company
420 West Industrial Avenue and 1200 Niccum Avenue
Effingham, Illinois 62401-2834

David A. Warren, Environmental Coordinator
217/540-6312

1.4 General Source Description

Quebecor World Direct - Petty Printing Company is located at 420 West Industrial Avenue and 1200 Niccum Avenue in Effingham. This source is a commercial lithographic printing operation that uses heatset web offset lithographic printing presses controlled by natural gas fired thermal oxidizers, uncontrolled heatset web offset lithographic printing presses, and inkjet printers. The products produced at this source are printed paper materials, promotionals, and pamphlets.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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
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
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
hr	hour
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
kW	kilowatts
lb	pound
mmBtu	Million British thermal units
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
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SIC	Standard Industrial Classification
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 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:

Scrap Paper Collection Systems

- 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).

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 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 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. 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.
- 3.2.3 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 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

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
01	Heatset Web Offset Lithographic Printing Press OP-202 with Natural Gas Fired Dryer	9/80 (Press) 7/99 (Modified) 6/99 (Oxidizer)	Natural Gas Fired Regenerative Thermal Oxidizer RTO-1
	Heatset Web Offset Lithographic Printing Press OP-206 with Natural Gas Fired Dryer	9/85 (Press) 7/99 (Modified) 6/99 (Oxidizer)	Natural Gas Fired Regenerative Thermal Oxidizer RTO-1
	Heatset Web Offset Lithographic Printing Press OP-211 with Natural Gas Fired Dryer	9/92 (Press) 7/99 (Modified) 6/99 (Oxidizer)	Natural Gas Fired Regenerative Thermal Oxidizer RTO-1
	Heatset Web Offset Lithographic Printing Press OP-30201 with Natural Gas Fired Dryer	5/94 (Press) 8/00 (Modified) 8/00 (Oxidizer)	Natural Gas Fired Recuperative Thermal Oxidizer RTO-4
	Heatset Web Offset Lithographic Printing Press OP-10207 with Natural Gas Fired Dryer	2/97 (Press) 7/99 (Modified) 4/02 (Modified) 8/00 (Oxidizer)	Natural Gas Fired Recuperative Thermal Oxidizer RTO-4
	Heatset Web Offset Lithographic Printing Press OP-30202 with Natural Gas Fired Dryer	6/99 (Press) 8/00 (Oxidizer)	Natural Gas Fired Recuperative Thermal Oxidizer RTO-4
	Heatset Web Offset Lithographic Printing Press OP-212 with Natural Gas Fired Dryer	2/00 (Press) 2/00 (Oxidizer)	Natural Gas Fired Recuperative Thermal Oxidizer RTO-3
	Heatset Web Offset Lithographic Printing Press OP-30204 with Natural Gas Fired Dryer	12/01 (Press) 8/00 (Oxidizer)	Natural Gas Fired Recuperative Thermal Oxidizer RTO-4
	Heatset Web Offset Lithographic Printing Press OP-30205 with Natural Gas Fired Dryer	4/02 (Press) 8/00 (Oxidizer)	Natural Gas Fired Recuperative Thermal Oxidizer RTO-4
	02	Heatset Web Offset Lithographic Printing Press OP-209 with Natural Gas Fired Dryer	9/85 7/99 (Modified)

Emission Unit	Description	Date Constructed	Emission Control Equipment
02 (Cont.)	Heatset Web Offset Lithographic Printing Press OP-201 with Natural Gas Fired Dryer	11/87 7/99 (Modified)	None
	Heatset Web Offset Lithographic Printing Press OP-210 with Natural Gas Fired Dryer	2/90 7/99 (Modified)	None
	Heatset Web Offset Lithographic Printing Press OP-10206 with Natural Gas Fired Dryer	6/95 7/99 (Modified)	None
03	32 Inkjet Printers	2/00	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.
- 5.1.3 For purposes of the CAAPP and Title I of the CAA, Quebecor World Direct - Petty Printing Company, I.D. No. 049025ABO, located at 420 West Industrial Avenue and 1200 Niccum Avenue in Effingham, is considered a single source with Quebecor World - Effingham Division, I.D. No. 049025AAT, located at 2701 South Banker Street in Effingham. The source has elected to obtain separate CAAPP permits for these locations. In addition, the source has elected to obtain a single CAAPP permit for the 420 West Industrial Avenue and the 1200 Niccum Avenue (formerly I.D. No. 049025ABR) locations, combined under one I.D. No. 049025ABO.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 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.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.
 - b. 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, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 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.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [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 Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC 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 40 CFR Part 70 or 71.
- 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 requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, 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.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.7 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of

the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 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 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Nitrogen Oxides (NO _x)	29.93
Particulate Matter (PM)	2.28
Sulfur Dioxide (SO ₂)	0.20
Volatile Organic Material (VOM)	457.25
HAP, not included in VOM or PM	-----
TOTAL	489.66

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

The affected printing lines OP-201, OP-202, OP-206, OP-211, OP-209, and OP-210 are subject to the applicable emission limitations established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

The emission limitations were established in State Construction and Operating Permits pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permits do 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 [T1].

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).

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Conditions 5.5.1 and 5.5.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.
- b. The affected printing lines OP-201, OP-202, OP-206, OP-211, OP-209, and OP-210 are subject to the applicable recordkeeping requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

5.6.2 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.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, 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. Annual emissions from the source in excess of the emission limits specified in Condition 5.5.1, within 30 days of such an occurrence.
- b. The affected printing lines OP-201, OP-202, OP-206, OP-211, OP-209, and OP-210 are subject to the applicable reporting requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Permitted Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 Heatset Web Offset Lithographic Printing Presses
Control Natural Gas Fired Thermal Oxidizers

7.1.1 Description

The description as described in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Rated Heat Input Capacity (mmBtu/hr)	Emission Control Equipment
01	Heatset Web Offset Lithographic Printing Press OP-202 with Natural Gas Fired Dryer	3.33 (Dryer) 1.4 (Oxidizer)	Natural Gas Fired Regenerative Thermal Oxidizer RTO-1
	Heatset Web Offset Lithographic Printing Press OP-206 with Natural Gas Fired Dryer	3.68 (Dryer) 1.4 (Oxidizer)	Natural Gas Fired Regenerative Thermal Oxidizer RTO-1
	Heatset Web Offset Lithographic Printing Press OP-211 with Natural Gas Fired Dryer	8.88 (Dryer) 1.4 (Oxidizer)	Natural Gas Fired Regenerative Thermal Oxidizer RTO-1
	Heatset Web Offset Lithographic Printing Press OP-30201 with Natural Gas Fired Dryer	9.6 (Dryer) 2.4 (Oxidizer)	Natural Gas Fired Recuperative Thermal Oxidizer RTO-4
	Heatset Web Offset Lithographic Printing Press OP-10207 with Natural Gas Fired Dryer	3.7 (Dryer) 2.4 (Oxidizer)	Natural Gas Fired Recuperative Thermal Oxidizer RTO-4
	Heatset Web Offset Lithographic Printing Press OP-30202 with Natural Gas Fired Dryer	2.78 (Dryer) 2.4 (Oxidizer)	Natural Gas Fired Recuperative Thermal Oxidizer RTO-4
	Heatset Web Offset Lithographic Printing Press OP-212 with Natural Gas Fired Dryer	3.7 (Dryer) 3.0 (Oxidizer)	Natural Gas Fired Recuperative Thermal Oxidizer RTO-3

Emission Unit	Description	Rated Heat Input Capacity (mmBtu/hr)	Emission Control Equipment
01 (Cont.)	Heatset Web Offset Lithographic Printing Press OP-30204 with Natural Gas Fired Dryer	5.2 (Dryer) 2.4 (Oxidizer)	Natural Gas Fired Recuperative Thermal Oxidizer RTO-4
	Heatset Web Offset Lithographic Printing Press OP-30205 with Natural Gas Fired Dryer	5.2 (Dryer) 2.4 (Oxidizer)	Natural Gas Fired Recuperative Thermal Oxidizer RTO-4

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected printing lines" for the purpose of these unit-specific conditions, are Heatset Web Offset Lithographic Printing Presses Controlled by Natural Gas Fired Thermal Oxidizers, as described in Conditions 7.1.1 and 7.1.2.
- b. Each affected printing line is subject to the emission limits identified in Condition 5.2.2(b).
- c. The affected printing lines are subject to 35 IAC 212.321. This regulation is attached hereto and incorporated herein by reference (Attachment 1).
- d. The affected printing lines are subject to 35 IAC 214.301. This regulation is attached hereto and incorporated herein by reference (Attachment 1).
- e. The affected printing lines are subject to 35 IAC 215.408(b). This regulation is attached hereto and incorporated herein by reference (Attachment 1).
- f. The affected printing lines are subject to the applicable provisions established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.1.4 Non-Applicability of Regulations of Concern

The affected printing lines are not subject to the applicable regulations as identified in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.1.5 Control and Operating Requirements and Work Practices

- a. The affected printing lines are subject to the applicable control requirements established in State

Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

- b. The affected printing lines are subject to the applicable operating requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).
- c. The affected printing lines are subject to the applicable work practice requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected printing lines are subject to the following:

The affected printing lines are subject to the applicable emission limitations established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

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).

The emission limitations were established in State Construction and Operating Permits pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permits do 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 [T1].

7.1.7 Testing Requirements

- a. The affected printing lines are subject to the applicable testing requirements of 35 IAC 215.409 and 215.410. These regulations are attached hereto and incorporated herein by reference (Attachment 1).
- b. The affected printing lines are subject to the applicable testing requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.1.8 Monitoring Requirements

The affected printing lines are subject to the applicable monitoring requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected printing line to demonstrate compliance with Conditions 5.5.1, 5.5.3, 7.1.3, 7.1.5, 7.1.6, 7.1.7, and 7.1.8, pursuant to Section 39.5(7)(b) of the Act:

The affected printing lines are subject to the applicable recordkeeping requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected printing line with the permit requirements as follows, 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:

The affected printing lines are subject to the applicable reporting requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

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 printing line 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:

The operational flexibility/anticipated operating scenarios established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

The affected printing lines are subject to the applicable compliance procedures established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.2 Unit 02 Heatset Web Offset Lithographic Printing Presses

7.2.1 Description

The description as described in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Rated Heat Input Capacity (mmBtu/hr)	Emission Control Equipment
02	Heatset Web Offset Lithographic Printing Press OP-209 with Natural Gas Fired Dryer	4.44	None
	Heatset Web Offset Lithographic Printing Press OP-201 with Natural Gas Fired Dryer	3.33	None
	Heatset Web Offset Lithographic Printing Press OP-210 with Natural Gas Fired Dryer	4.37	None
	Heatset Web Offset Lithographic Printing Press OP-10206 with Natural Gas Fired Dryer	3.30	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected printing lines" for the purpose of these unit-specific conditions, are Heatset Web Offset Lithographic Printing Presses, as described in Conditions 7.2.1 and 7.2.2.
- b. Each affected printing line is subject to the emission limits identified in Condition 5.2.2(b).
- c. The affected printing lines are subject to 35 IAC 212.321. This regulation is attached hereto and incorporated herein by reference (Attachment 1).
- d. The affected printing lines are subject to 35 IAC 214.301. This regulation is attached hereto and incorporated herein by reference (Attachment 1).
- e. The affected printing lines are subject to 35 IAC 215.408(b). This regulation is attached hereto and incorporated herein by reference (Attachment 1).
- f. The affected printing lines are subject to the applicable provisions established in State

Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.2.4 Non-Applicability of Regulations of Concern

The affected printing lines are not subject to the applicable regulations as identified in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.2.5 Operating Requirements and Work Practices

- a. The affected printing lines are subject to the applicable operating requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).
- b. The affected printing lines are subject to the applicable work practice requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected printing lines are subject to the following:

The affected printing lines are subject to the applicable emission limitations established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

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).

The emission limitations were established in State Construction and Operating Permits pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permits do 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 [T1].

7.2.7 Testing Requirements

- a. The affected printing lines are subject to the applicable testing requirements of 35 IAC 215.409 and

215.410. These regulations are attached hereto and incorporated herein by reference (Attachment 1).

- b. The affected printing lines are subject to the applicable testing requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.2.8 Monitoring Requirements

The affected printing lines are subject to the applicable monitoring requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected printing line to demonstrate compliance with Conditions 5.5.1, 5.5.3, 7.2.3, 7.2.5, 7.2.6, 7.2.7, and 7.2.8, pursuant to Section 39.5(7)(b) of the Act:

The affected printing lines are subject to the applicable recordkeeping requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected printing line with the permit requirements as follows, 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:

The affected printing lines are subject to the applicable reporting requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected printing line 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:

The operational flexibility/anticipated operating scenarios established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

The affected printing lines are subject to the applicable compliance procedures established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.3 Unit 03 Inkjet Printers

7.3.1 Description

The inkjet printers are used at the Mailing Center to print addresses.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
03	32 Inkjet Printers	None

7.3.3 Applicability Provisions and Applicable Regulations

The "affected printing lines" for the purpose of these unit-specific conditions, are Inkjet Printers, as described in Conditions 7.3.1 and 7.3.2.

7.3.4 Non-Applicability of Regulations of Concern

N/A

7.3.5 Control Requirements

None

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected printing lines are subject to the following:

The affected printing lines are subject to the applicable emission limitations established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

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).

The emission limitations were established in State Construction and Operating Permits pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permits do 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 [T1].

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected printing lines to demonstrate compliance with Conditions 5.5.1 and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

The affected printing lines are subject to the applicable recordkeeping requirements established in State Construction and Operating Permits attached hereto and incorporated herein by reference (Attachment 2).

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected printing lines with the permit requirements, 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.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9.

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 September 6, 2002 (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].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

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. 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 Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [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 determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which 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. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

iii. Illinois EPA - Air Permit Section

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

iv. USEPA Region 5 - Air Branch

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

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

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 [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- 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, 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, 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 such malfunction or breakdown is allowed by a permit condition [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 thereunder.

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, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- 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
 - 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 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. As 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 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, Compliance 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 Section, 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 [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment 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:
 - 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. Normally, an act of God such as lightning or flood is considered an emergency;
 - 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.

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, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, 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 inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

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 under Section 39.5(15)(b) 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, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. 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

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Applicable State of Illinois Rules and Regulations, Title 35: Environmental Protection, Subtitle B: Air Pollution, Chapter I: Pollution Control Board, Subchapter c: Emission Standards and Limitations for Stationary Sources

**PART 212
VISIBLE AND PARTICULATE MATTER EMISSIONS**

SUBPART L: PARTICULATE MATTER EMISSIONS FROM PROCESS EMISSION UNITS

Section 212.321 Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972

- a) Except as further provided in this Part, 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 this Section.
- b) Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

where

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

- 1) Up to process weight rates of 408 MG/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

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

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

c) Limits for Process Emission Units For Which Construction of Modification Commenced On or After April 14,1972

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	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.	3.9	10.00	8.70
13.	4.8	15.00	10.80
18.	5.7	20.00	12.50
23.	6.5	25.00	14.00
27.	7.1	30.00	15.60
32.	7.7	35.00	17.00
36.	8.2	40.00	18.20
41.	8.8	45.00	19.20
45.	9.3	50.00	20.50
90.	13.4	100.00	29.50
140.	17.0	150.00	37.00
180.	19.4	200.00	43.00
230.	22.	250.00	48.50
270.	24.	300.00	53.00
320.	26.	350.00	58.00
360.	28.	400.00	62.00
408.	30.1	450.00	66.00
454.	30.4	500.00	67.00

where:

P = Process weight rate in metric or T/hr, and
 E = Allowable emission rate in kg/hr or lbs/hr.

(Source: Amended at 20 Ill. Reg. 7605, effective May 22, 2996)

PART 214
SULFUR LIMITATIONS

SUBPART K: PROCESS EMISSION SOURCES

Section 214.301 General Limitation

Except as further provided by this Part, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.

(Source: Amended at 7 Ill. Reg. 4219, effective March 28, 1983)

PART 215
ORGANIC MATERIAL EMISSION STANDARDS AND LIMITATIONS

SUBPART A: GENERAL PROVISIONS

Section 215.102 Testing Methods

Volatile organic material or organic material concentrations in a stream is measured by Method 18, 40 CFR 60, Appendix A, incorporated by reference in Section 215.105, Measurement of Gaseous Organic Compounds incorporated by reference in 215.105 except as follows. ASTM D-4457, incorporated by reference in Section 215.105, may be used for halogenated organic compounds. Method 25, 25A or 25B, 40 CFR 60, Appendix A, incorporated by reference in 215.105 may be substituted for Method 18 provided the source owner or operator submits calibration data and other proof that this method provides the information in the emission units of the applicable standard. The volumetric flow rate and gas velocity is determined in accordance with Methods 1, 1A, 2, 2A, 2C, 2D, 3 and 4, 40 CFR Part 60, Appendix A, incorporated by reference in 215.105. Any other alternate test method must be approved by the Agency, which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Agency determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Agency shall approve the proposed alternative.

(Source: Amended at 15 Ill. Reg. 8018, effective May 14, 1991)

SUBPART F: COATING OPERATIONS

Section 215.204 Emission Limitations for Manufacturing Plants

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 this Part, delivered to the coating applicator:

a) Automobile or Light Duty Truck Manufacturing Plants

1)	In Boone County	<u>kg/l</u>	<u>lb/gal</u>
	Prime coat	0.14	(1.2)
	Prime surfacer coat	0.34	(2.8)
	Top coat	0.34	(2.8)

(BOARD NOTE: The top coat limitation shall not apply if by December 31, 1984 a limitation of 0.43 kg/l (3.6 lb/gal) is achieved and the top coat is applied with a transfer efficiency of not less than 55 percent and by December 31, 1986, the top coat is applied with a transfer efficiency of not less than 65 percent)

	Final repair coat	0.58	(4.8)
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2)	In the remaining counties	<u>kg/l</u>	<u>lb/gal</u>
	Prime coat	0.14	(1.2)
	Prime surfacer coat	0.34	(2.8)
	Top coat	0.34	(2.8)
	Final repair coat	0.58	(4.8)

b) Can Coating kg/l lb/gal

1)	Sheet basecoat and Overvarnish	0.34	(2.8)
2)	Exterior basecoat and overvarnish	0.34	(2.8)
3)	Interior body spray coat	0.51	(4.2)
4)	Exterior end coat	0.51	(4.2)
5)	Side seam spray coat	0.66	(5.5)
6)	End sealing compound coat	0.44	(3.7)

c)	Paper Coating	<u>kg/l</u>	<u>lb/gal</u>
1)	All paper coating except as provided in subsection (c)(2)	0.35	(2.9)
2)	Specialty High Gloss Catalyzed Coating	0.42	(3.5)

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

d)	Coil Coating	0.31	(2.6)
e)	Fabric Coating	0.35	(2.9)
f)	Vinyl Coating	0.45	(3.8)
g)	Metal Furniture Coating	0.36	(3.0)
h)	Large Appliance Coating	0.34	(2.8)

(BOARD NOTE: The limitation shall not apply to the use of quick-drying lacquers for repair of scratches and nicks that occur during assembly, provided that the volume of coating does not exceed 0.95 liters (1 quart) in any one eight-hour period)

i)	Magnet Wire Coating	<u>kg/l</u>	<u>lb/gal</u>
		0.20	(1.7)
j)	Miscellaneous Metal Parts and Products Coating		
1)	Clear coating	0.52	(4.3)
2)	Air dried coating	0.42	(3.5)
3)	Extreme performance coating	0.42	(3.5)
4)	Power driven fastener coating		
A)	Nail Coating	Refer to limits in (j) (1), (2), (3) and (5)	
B)	Staple, brad and finish nail unit fabrication bonding coating	0.64	(5.3)

C)	Staple, brad and finish nail incremental fabrication lubricity coating	0.64	(5.3)
D)	Staple, brad and finish nail incremental fabrication withdrawal resistance coating	0.60	(5.0)
E)	Staple, brad and finish nail unit fabrication coating	0.64	(5.3)
5)	All other coatings	0.36	(3.0)

(BOARD NOTE: The least restrictive limitation shall apply if more than one limitation pertains to a specific coating)

k)	Heavy Off-highway Vehicle Products	<u>kg/l</u>	<u>lb/gal</u>
1)	In Macoupin County		
	Extreme performance prime coat	0.42	(3.5)
	Extreme performance top coat-air dried	0.42	(3.5)
	Final repair coat-air dried	0.42	(3.5)
	High-temperature aluminum coating used at existing diesel-electric locomotive manufacturing plants	0.72	(6.0)
2)	In the remaining counties		
	Extreme performance prime coat	0.42	(3.5)
	Extreme performance top coat-air dried	0.52	(4.3)
	Final repair coat- air dried	0.58	(4.8)
1)	Wood Furniture Coating	<u>kg/l</u>	<u>lb/gal</u>
1)	Clear topcoat	0.67	(5.6)
2)	Opaque stain	0.56	(4.7)
3)	Pigmented coat	0.60	(5.0)
4)	Repair coat	0.67	(5.6)
5)	Sealer	0.67	(5.6)
6)	Semi-transparent stain	0.79	(6.6)
7)	Wash coat	0.73	(6.1)

(BOARD NOTE: The repair coat has overall transfer efficiency of 30 percent; all others have an overall transfer efficiency of 65 percent.)

(Source: Amended at 22 Ill. Reg. 11427, effective June 19, 1998)

SUBPART P: PRINTING AND PUBLISHING

Section 215.403 Applicability of Subpart K

Upon achieving compliance with this Subpart, the emission source is not required to meet Subpart K. Emission sources exempted from this Subpart are subject to Subpart K. Roto- gravure or flexographic equipment used for both roll printing and paper coating are subject to this Subpart.

(Source: Added at 7 Ill. Reg. 1244, effective January 21, 1983)

Section 215.408 Heatset Web Offset Lithographic Printing

- a) No owner or operator of a heatset web offset lithographic printing facility, located in Cook, DuPage, Kane, Lake, Macoupin, Madison, McHenry, Monroe, St. Clair or Will County, emitting over 100 tons/year of organic material, in the absence of pollution control equipment, may cause or allow the operation of a heatset web offset press unless:
 - 1) An incinerator system is installed and operated that oxidizes at least 90 percent of the organic materials (measured as total combustible carbon) in the dryer exhaust airstream to carbon dioxide and water; or
 - 2) The fountain solution contains no more than eight (8) percent, by weight, of volatile organic material and a condensation recovery system is installed and operated that removes at least 75 percent of the non-isopropyl alcohol organic materials from the dryer exhaust airstream.

- b) No owner or operator of a heatset web offset lithographic printing facility, located in a county other than Cook, DuPage, Kane, Lake, Macoupin, Madison, McHenry, Monroe, St. Clair or Will County, emitting over 100 tons/year of organic material, in the absence of pollution control equipment, may cause or allow the operation of a heatset web offset press unless the fountain solution contains no more than eight (8) percent, by weight, of volatile organic material.

(Source: Added at 11 Ill. Reg. 16706, effective September 30, 1987)

Section 215.409 Testing Methods for Volatile Organic Material Content

The volatile organic material content of fountain solution and all coatings shall be determined by Method 24, 40 CFR 60, Appendix A, incorporated by reference in Section 215.105. The volatile organic material content of printing inks shall be determined by Method 24A, 40 CFR Part 60, Appendix A, incorporated by reference in Section 215.105. Any alternate test method must be approved by the Agency, which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Agency determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Agency shall approve the proposed alternative.

(Source: Added at 14 Ill. Reg. 9173, effective May 23, 1990)

Section 215.410 Emissions Testing

- a) Any tests of volatile organic material emissions, including tests conducted to determine control equipment efficiency or control device destruction efficiency, shall be conducted in accordance with the methods and procedures specified in Section 215.102.
- b) Upon a reasonable request by the Agency, the owner or operator of a volatile organic material emission source required to comply with the limits of this Subpart shall conduct emissions testing, at his own expense, to demonstrate compliance.
- c) A person planning to conduct a volatile organic material emissions test to demonstrate compliance with this Subpart shall notify the Agency of that intent not less than 30 days before the planned initiation of the tests so the Agency may observe the test.

(Source: Added at 14 Ill. Reg. 9173, effective May 23, 1990)

10.2 Attachment 2 State Construction and Operating Permits

The following permits and attachments contain applicable requirements to this source and are an integral part of this permit. The permit conditions contained in these attachments should be thoroughly reviewed and complied with, including all emission limitations, monitoring, recordkeeping, and reporting requirements. Any requirements of these permits and attachments that conflict with those requirements found in Sections 3 through 9 are superseded by those requirements found in Sections 3 through 9. In the event that there are conflicting requirements in the incorporated State Construction and Operating Permits, the most recently issued permit conditions shall apply.

CONSTRUCTION PERMIT -- REVISED

PERMITTEE

Quebecor World Direct - Petty Printing Company
Attn: Dave Warren
420 West Industrial Avenue
Effingham, Illinois 62401

Application No.: 01110020 I.D. No.: 049025ABO
Applicant's Designation: Project 2001B Date Received: February 5, 2002
Subject: Project 2001B
Date Issued: April 12, 2002
Location: 1200 Niccum Avenue, Effingham and 420 West Industrial Avenue,
Effingham

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of two heatset web offset lithographic printing lines (presses 30204 and 30205) controlled by an existing thermal oxidizer (TRO 4) as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.0 Unit Specific Conditions

1.1 Unit: Heatset Web Offset Lithographic Printing Lines
Control: Thermal Oxidizer

1.1.1 Description

The source is adding two new heatset web offset lithographic printing presses with dryers. These emission units will be controlled by an existing thermal oxidizer. These new presses would be located at Quebecor's Niccum Avenue facility and is unrelated to other new presses recently installed at the Industrial Avenue facility.

1.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
30204	Heatset Web Offset Lithographic Printing Press with Dryer	Thermal Oxidizer #4 (TRO 4)
30205	Heatset Web Offset Lithographic Printing Press with Dryer	Thermal Oxidizer #4 (TRO 4)

1.1.3 Applicability Provisions and Applicable Regulations

a. An "affected printing line" for the purpose of these unit-specific conditions, is each lithographic

printing line as described in Conditions 1.1.1 and 1.1.2.

- b. The affected printing lines are subject to 35 IAC 212.321(a), which provides that the Permittee shall not 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 [35 IAC 212.321(a)].
- c. The as-applied fountain solution used on the affected printing lines shall contain no more than eight (8) percent, by weight, of volatile organic material, pursuant to 35 IAC 215.408(b).
- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].

1.1.4 Non-Applicability of Regulations of Concern

- a. The affected printing lines are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 9 and 63, Subparts A and KK, because the affected printing lines are not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.
- b. The press dryers associated with the affected printing lines are not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the press dryers are not by definition fuel combustion emission units.
- c. The affected printing lines are not subject to 35 IAC 215.204(c), Coating Operations/Paper Coating, as the paper coating limitation does not apply to equipment used for both printing and paper coating [35 IAC 215.204(c)].
- d. The affected printing lines are not subject to 35 IAC Part 215, Subpart K, Use of Organic Material, because the affected printing lines comply with 35 IAC Part 215, Subpart P, Printing and Publishing [35 IAC 215.403].

1.1.5 Control Requirements

- a. When demonstrating compliance with condition 1.1.6 through the use of the thermal oxidizer, the thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, before the printing process is begun, and this temperature shall be maintained during operation of the affected printing line.
- b. The affected printing lines shall only be operated with natural gas as the fuel in the dryers and thermal oxidizer.
- c. The Permittee shall use measures to minimize uncontrolled emissions including but not limited to:
 - i. Rescheduling of work to other presses to limit the use of Presses 30204 and/or 30205 during uncontrolled operation;
 - ii. Having repair parts delivered via express shipping;
 - iii. Having maintenance personnel trained to work with the factory diagnostic unit; and
 - iv. Stock all parts that are economically feasible.

1.1.6 Emission Limitations

The affected printing lines are subject to the following:

- a. Emissions of volatile organic material from the affected printing lines combined shall not exceed 5.25 tons per month and 31.5 tons per year. These limits are based on the maximum material usage and emission factors and formulas in Condition 1.1.12(b).
- b. Emissions from the press dryer shall not exceed the following limits:

<u>Pollutant</u>	<u>Emissions (Tons/Year)</u>
NO _x	4.23
CO	3.56
VOM	1.01
PM	0.33
SO ₂	0.03

These limits are based on the maximum firing rate of the dryers and the maximum hours of operation (8,760 hours/year).

- c. The emissions of hazardous air pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs.
- d. 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).
- e. The source has addressed the applicability and compliance of 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules.

1.1.7 Testing Requirements

- a. The volatile organic material content of fountain solution, inks and all coatings shall be determined by Method 24, 40 CFR 60, Appendix A, incorporated by reference in 35 IAC 215.105. 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 [35 IAC 215.409].
- b. As an alternative to Condition 1.1.7(a), the manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, blanket washes, and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a); provided, however, Method 24, 40 CFR Part 60, Appendix A, shall be used to determine compliance.
- c. Any tests of volatile organic material emissions, including tests conducted to determine control equipment efficiency or control device destruction efficiency, shall be conducted in accordance with the methods and procedures specified in Section 215.102 [35 IAC 215.410(a)].

- d. Upon a reasonable request by the Illinois EPA, the owner or operator of a volatile organic material emission source required to comply with the limits of this Subpart shall conduct emissions testing, at his own expense, to demonstrate compliance [35 IAC 215.410(b)].
- e. A person planning to conduct a volatile organic material emissions test to demonstrate compliance with this Subpart shall notify the Illinois EPA of that intent not less than 30 days before the planned initiation of the tests so the Illinois EPA may observe the test [35 IAC 215.410(c)].

1.1.8 Monitoring Requirements

The thermal oxidizer shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor's specifications at all times that the thermal oxidizer is in use. This device shall monitor the thermal oxidizer combustion chamber temperature.

1.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected printing lines to demonstrate compliance with Conditions 1.1.3 and 1.1.6:

- a. Weight of ink used (amount purchased minus amount discarded or recycled) (pounds);
- b. Weight percent VOM in ink (wt. %);
- c. Volume of fountain solution additive used (amount purchased minus amount discarded or recycled) (gallons);
- d. Pounds of VOM per gallon of fountain solution additive (pounds/gallon);
- e. VOM content of the as-applied fountain solution (percent, by weight);
- f. Volume of manual cleaning solvent used (amount purchased minus amount discarded or recycled) (gallons);
- g. Pounds of VOM per gallon of manual cleaning solvent (pounds/gallon);
- h. The Permittee shall collect and record the following information each day;

- i. Thermal oxidizer combustion chamber monitoring data.
 - ii. A log of operating time for the capture system, thermal oxidizer, monitoring device, and the associated emission unit(s).
 - iii. A maintenance log for the capture system, thermal oxidizer, and monitoring device detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- i. The aggregate monthly and annual VOM and HAP (individual HAPs and combination of HAPs) emissions from the affected printing lines (tons/month and tons/year); and
 - j. Records of the monthly and annual aggregate CO, NO_x, PM, SO₂, and VOM emissions from the press dryers associated with the affected printing lines shall be maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

1.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the affected printing lines with the permit requirements as follows. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

1.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected printing lines 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:

Usage of different inks, fountain solutions, or blanket washes for the affected printing lines, provided that the Permittee continues to comply with the conditions of this permit.

1.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 1.1.9 and the emission factors and formulas listed below:

- a. Compliance with Condition 1.1.3(d) is assured by the work-practices inherent in operation of the natural gas-fired press dryers and thermal oxidizer.
- b. To determine compliance with Condition 1.1.6(a), emissions from the affected printing lines shall be calculated based on the following:

Ink VOM Emissions (E_I):

$$E_I = (M_I W_I / 100) (1 - R_I / 100) [1 - (K / 100) (J_I / 100)]$$

Fountain Solution VOM Emissions (E_F):

$$E_F = (M_F W_F / 100)$$

Manual Cleaning Solvent VOM Emissions (E_M):

$$E_M = (M_M W_M / 100) (1 - R_M / 100)$$

Total VOM Emissions (E_T):

$$E_T = E_I + E_F + E_M$$

Where:

- M_I = Weight of ink used (amount purchased minus amount discarded or recycled) (pounds)
- W_I = Weight percent VOM in ink (wt. %)
- R_I = Percent of Ink VOM Retained In Printed Product (20%)
- K = Control efficiency of thermal oxidizer* (95%)
- J_I = Capture Efficiency Of Dryer and Control System For Ink VOM (100%)
- M_F = Volume of fountain solution additive used (amount purchased minus amount discarded or recycled) (gallons)
- W_F = Pounds VOM per gallon of fountain solution additive (pounds/gallon)
- M_M = Volume of manual cleaning solvent used (amount purchased minus amount discarded or recycled) (gallons)

W_M = Pounds VOM per gallon of manual cleaning solvent (pounds/gallon)

R_M = Percent of Manual Cleaning Solvent VOM retained in wipers (50%)

* As specified by manufacturer or vendor of the thermal oxidizer or by testing pursuant to Condition 1.1.7. Note: if the control device is not being used then $K = 0\%$.

c. Compliance with the emission limits in condition 1.1.6(b) is assured because the dryer emission limits are based on the maximum capacity of the emission unit. As a result, no compliance procedures are set in this permit addressing these requirements.

2. This permit authorizes the Permittee to modify TR04 to control press 10207.

3. Operation of the equipment being constructed and/or modified is allowed under this permit until final action is taken on the Clean Air Act Permit Program (CAAPP) application for this source, provided that such CAAPP application has been received and been deemed complete by the Illinois EPA. As a result, the Permittee must still update the CAAPP application to include the aforementioned equipment but is not required to submit an application for a state operating permit in the interim.

Please note that this permit is issued for the construction (and operation) of the equipment listed above. The Permittee should update their CAAPP application to include this new equipment by submitting form 505-CAAPP - "Supplement to CAAPP Application" along with all other appropriate information to accomplish this.

It should be noted that this permit has been revised to include another lithographic press (30205).

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

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

DES:JMS:jar

cc: Region 3

OPERATING PERMIT

PERMITTEE

Quebecor World Direct - Petty Printing Company
 Attn: Joe Woodall
 420 West Industrial Avenue
 Effingham, Illinois 62401

Application No.: 00040038 I.D. No.: 049025ABO
Applicant's Designation: PROJ2000A Date Received: February 16, 2001
Subject: Additional Three Units to Press 30201
Date Issued: March 14, 2001 Expiration Date: March 14, 2006
Location: 1200 Niccum Avenue, Effingham and 420 West Industrial Avenue,
 Effingham

This Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of three additional print units for lithographic press 30201 controlled by a thermal oxidizer (TRO 4) as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.0 Unit Specific Conditions

1.1 Unit: Heatset Web Offset Lithographic Printing Line
 Control: Thermal Oxidizer

1.1.1 Description

The source is modifying an existing lithographic printing press (30201) by adding three additional print units. This emission unit will have the capability of being controlled by a thermal oxidizer (TRO 4).

1.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
30201	Heatset Web Offset Lithographic Printing Press with Dryer	Thermal Oxidizer #4 (TRO 4)

1.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected printing line" for the purpose of these unit-specific conditions, is a lithographic printing line as described in Conditions 1.1.1 and 1.1.2.
- b. The affected printing line is subject to 35 IAC 212.321(a), which provides that the Permittee shall not 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 [35 IAC 212.321(a)].

- c. The as-applied fountain solution used on the affected printing line shall contain no more than eight (8) percent, by weight, of volatile organic material, pursuant to 35 IAC 215.408(b).
- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].

1.1.4 Non-Applicability of Regulations of Concern

- a. The affected printing line is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 9 and 63, Subparts A and KK, because the affected printing line is not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.
- b. The press dryer associated with the affected printing line is not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the press dryer is not by definition a fuel combustion emission unit.
- c. The affected printing line is not subject to 35 IAC 215.204(c), Coating Operations/Paper Coating, as the paper coating limitation does not apply to equipment used for both printing and paper coating [35 IAC 215.204(c)].
- d. The affected printing line is not subject to 35 IAC Part 215, Subpart K, Use of Organic Material, because the affected printing line complies with 35 IAC Part 215, Subpart P, Printing and Publishing [35 IAC 215.403].

1.1.5 Control Requirements

- a. When demonstrating compliance with condition 1.1.6 through the use of the thermal oxidizer, the thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test,

before the printing process is begun, and this temperature shall be maintained during operation of the affected printing line.

- b. The affected printing line shall only be operated with natural gas as the fuel in the dryer and thermal oxidizer.
- c. The Permittee shall use measures to minimize uncontrolled emissions including but not limited to:
 - i. Rescheduling of work to other presses to limit the use of Press 30201 during uncontrolled operation;
 - ii. Having repair parts delivered via express shipping;
 - iii. Having maintenance personnel trained to work with the factory diagnostic unit; and
 - iv. Stock all parts that are economically feasible.

1.1.6 Emission Limitations

The affected printing line is subject to the following:

- a. Emissions of volatile organic material from the affected printing line shall not exceed 5.9 tons per month and 35.2 tons per year. These limits are based on the maximum material usage and emission factors and formulas in Condition 1.1.12(b).
- b. The emissions of hazardous air pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs.
- c. 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).
- d. The source has addressed the applicability and compliance of 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules.

1.1.7 Testing Requirements

- a. The volatile organic material content of fountain solution, inks and all coatings shall be determined by Method 24, 40 CFR 60, Appendix A, incorporated by reference in 35 IAC 215.105. 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 [35 IAC 215.409].
- b. As an alternative to Condition 1.1.7(a), the manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, blanket washes, and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a); provided, however, Method 24, 40 CFR Part 60, Appendix A, shall be used to determine compliance.
- c. Any tests of volatile organic material emissions, including tests conducted to determine control equipment efficiency or control device destruction efficiency, shall be conducted in accordance with the methods and procedures specified in Section 215.102 [35 IAC 215.410(a)].
- d. Upon a reasonable request by the Illinois EPA, the owner or operator of a volatile organic material emission source required to comply with the limits of this Subpart shall conduct emissions testing, at his own expense, to demonstrate compliance [35 IAC 215.410(b)].
- e. A person planning to conduct a volatile organic material emissions test to demonstrate compliance with this Subpart shall notify the Illinois EPA of that intent not less than 30 days before the planned initiation of the tests so the Illinois EPA may observe the test [35 IAC 215.410(c)].

1.1.8 Monitoring Requirements

The thermal oxidizer shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor's specifications at all times that the thermal oxidizer is

in use. This device shall monitor the thermal oxidizer combustion chamber temperature.

1.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected printing line to demonstrate compliance with Conditions 1.1.3 and 1.1.6:

- a. Weight of ink used (amount purchased minus amount discarded or recycled) (pounds);
- b. Weight percent VOM in ink (wt. %);
- c. Volume of fountain solution additive used (amount purchased minus amount discarded or recycled) (gallons);
- d. Pounds of VOM per gallon of fountain solution additive (pounds/gallon);
- e. VOM content of the as-applied fountain solution (percent, by weight);
- f. Volume of manual cleaning solvent used (amount purchased minus amount discarded or recycled) (gallons);
- g. Pounds of VOM per gallon of manual cleaning solvent (pounds/gallon);
- h. The Permittee shall collect and record the following information each day:
 - i. Thermal oxidizer combustion chamber monitoring data.
 - ii. A log of operating time for the capture system, thermal oxidizer, monitoring device, and the associated emission unit(s).
 - iii. A maintenance log for the capture system, thermal oxidizer, and monitoring device detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- i. The aggregate monthly and annual VOM and HAP (individual HAPs and combination of HAPs) emissions from the affected printing line (tons/month and tons/year); and
- j. Records of the monthly and annual aggregate CO, NO_x, PM, SO₂, and VOM emissions from the press dryer

associated with the affected printing line shall be maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

1.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected printing line with the permit requirements as follows. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

None

1.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected printing line 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:

Usage of different inks, fountain solutions, or blanket washes for the affected printing line, provided that the Permittee continues to comply with the conditions of this permit.

1.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 1.1.9 and the emission factors and formulas listed below:

- a. Compliance with Condition 1.1.3(d) is assured by the work-practices inherent in operation of a natural gas-fired press dryer and thermal oxidizer.
- b. To determine compliance with Condition 1.1.6(a), emissions from the affected printing line shall be calculated based on the following:

Ink VOM Emissions (E_I):

$$E_I = (M_I W_I / 100) (1 - R_I / 100) [1 - (K / 100) (J_I / 100)]$$

Fountain Solution VOM Emissions (E_F):

$$E_F = (M_F W_F / 100)$$

Manual Cleaning Solvent VOM Emissions (E_M):

$$E_M = (M_M W_M / 100) (1 - R_M / 100)$$

Total VOM Emissions (E_T):

$$E_T = E_I + E_F + E_M$$

Where:

- M_I = Weight of ink used (amount purchased minus amount discarded or recycled) (pounds)
- W_I = Weight percent VOM in ink (wt. %)
- R_I = Percent of Ink VOM Retained In Printed Product (20%)
- K = Control efficiency of thermal oxidizer* (95%)
- J_I = Capture Efficiency Of Dryer and Control System For Ink VOM (100%)
- M_F = Volume of fountain solution additive used (amount purchased minus amount discarded or recycled) (gallons)
- W_F = Pounds VOM per gallon of fountain solution additive (pounds/gallon)
- M_M = Volume of manual cleaning solvent used (amount purchased minus amount discarded or recycled) (gallons)
- W_M = Pounds VOM per gallon of manual cleaning solvent (pounds/gallon)
- R_M = Percent of Manual Cleaning Solvent VOM retained in wipers (50%)

* As specified by testing pursuant to Condition 1.1.7. Note: if the control device is not being used then $K = 0\%$.

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

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

DES:JMS:jar

cc: Region 3

217/782-2113

"REVISED"
JOINT CONSTRUCTION AND OPERATING PERMIT

PERMITTEE

Quebecor World Direct - Petty Printing Company
Attn: Joe Woodall
420 West Industrial Avenue
Effingham, Illinois 62401

<u>Application No.:</u> 00010020	<u>I.D. No.:</u> 049025ABO
<u>Applicant's Designation:</u> PROJ2000	<u>Date Received:</u> January 10, 2000
<u>Subject:</u> Mailing Center, Lithographic Printing	
<u>Date Issued:</u> February 22, 2000	<u>Operating Permit Expiration</u>
	<u>Date:</u> February 22, 2005

Location: 1200 Niccum Avenue, Effingham and
420 West Industrial Avenue, Effingham

Permit is hereby granted to the above-designated Permittee to CONSTRUCT and OPERATE emission source(s) and/or air pollution control equipment consisting of one heatset web offset lithographic printing line and 32 ink jet printers, and one scrap paper collection system controlled by baghouses 1, 2, and 3 as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Operation of the emission source(s) included in this permit shall not begin until all associated air pollution control equipment has been constructed and is operational.

2.0 Unit Specific Conditions

2.1 Unit: Heatset Web Offset Lithographic Printing Line
Control: Thermal Oxidizer

2.1.1 Description

The source is adding a new heatset web offset lithographic printing press with a dryer. This emission unit will have the capability of being controlled by a new thermal oxidizer.

2.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
212	Harris M1000 Heatset Web Offset Lithographic Printing Press With Dryer	Thermal Oxidizer #3 (TRO 3)

2.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected printing line" for the purpose of these unit-specific conditions, is a lithographic printing line as described in Conditions 2.1.1 and 2.1.2.
- b. The affected printing line 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 [35 IAC 212.321(a)].
- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].
- d. No owner or operator of a heatset web offset lithographic printing facility, located in a county other than Cook, DuPage, Kane, Lake, Macoupin, Madison, McHenry, Monroe, St. Clair or Will County, emitting over 100 tons/year of organic material, in the absence of pollution control equipment, may cause or allow the operation of a heatset web offset press unless the fountain solution contains no more than eight (8) percent, by weight, of volatile organic material, as applied [35 IAC 215.408(b)].

2.1.4 Non-Applicability of Regulations of Concern

- a. The affected printing line is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 9 and 63, Subparts A and KK, because the affected printing line is not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.
- b. The press dryer associated with the affected printing line is not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the actual heat input of each unit is less than 2.9 MW (10 mmBtu/hr) and the press dryer is not by definition fuel combustion emission units.
- c. The press dryer associated with the affected printing line is not subject to 35 IAC 217.121, emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit

is less than 73.2 MW (250 mmBtu/hr) and the press dryer is not by definition fuel combustion emission units.

- d. The affected printing line is not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM₁₀, as identified in 35 IAC 212.324(a)(1).
- e. The affected printing line is not subject to 35 IAC 215.204(c), Coating Operations/Paper Coating, as the paper coating limitation does not apply to equipment used for both printing and paper coating [35 IAC 215.204(c)].
- f. The affected printing line is not subject to 35 IAC Part 215, Subpart K, Use of Organic Material, because the affected printing line complies with 35 IAC Part 215, Subpart P, Printing and Publishing [35 IAC 215.403].

2.1.5 Control Requirements

- a. When demonstrating compliance with condition 2.1.6 through the use of the thermal oxidizer, the thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, before the printing process is begun, and this temperature shall be maintained during operation of the affected printing line.
- b. The affected printing line shall only be operated with natural gas as the fuel in the dryer and thermal oxidizer.

2.1.6 Emission Limitations

The affected printing line is subject to the following:

- a. Emissions of volatile organic material from the affected printing line shall not exceed 4.2 tons per month and 25.0 tons per year. These limits are based on the maximum material usage and emission factors and formulas in Condition 2.1.12(b).
- b. Emissions from the press dryer and thermal oxidizer shall not exceed the following limits:

<u>Pollutant</u>	<u>Emissions (Tons/Year)</u>
NO _x	2.94
CO	2.47
VOM	0.16
PM	0.23
SO ₂	0.02

These limits are based on the maximum firing rate of the dryer and thermal oxidizer and the maximum hours of operation (8,760 hours/year).

- c. 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).
- d. The source has addressed the applicability and compliance of 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules.

2.1.7 Testing Requirements

- a. The volatile organic material content of fountain solution, inks and all coatings shall be determined by Method 24, 40 CFR 60, Appendix A, incorporated by reference in Section 215.105. 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 [35 IAC 215.409].
- b. As an alternative to Condition 2.1.7(a), the manufacturer=s specifications for VOM content for fountain solution additives, cleaning solvents, blanket washes, and inks may be used if such manufacturer=s specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a); provided, however, Method 24, 40 CFR Part 60, Appendix A, shall be used to determine compliance.
- c. Any tests of volatile organic material emissions, including tests conducted to determine control

equipment efficiency or control device destruction efficiency, shall be conducted in accordance with the methods and procedures specified in Section 215.102 [35 IAC 215.410(a)].

- d. Upon a reasonable request by the Illinois EPA, the owner or operator of a volatile organic material emission source required to comply with the limits of this Subpart shall conduct emissions testing, at his own expense, to demonstrate compliance [35 IAC 215.410(b)].
- e. A person planning to conduct a volatile organic material emissions test to demonstrate compliance with this Subpart shall notify the Illinois EPA of that intent not less than 30 days before the planned initiation of the tests so the Illinois EPA may observe the test [35 IAC 215.410(c)].

2.1.8 Monitoring Requirements

The thermal oxidizer shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor=s specifications at all times that the thermal oxidizer is in use. This device shall monitor the thermal oxidizer combustion chamber temperature.

2.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected printing line to demonstrate compliance with Conditions 2.1.3 and 2.1.6:

- a. Weight of ink used (amount purchased minus amount discarded or recycled) (tons);
- b. Weight percent VOM in ink (wt. %);
- c. Weight of fountain solution additive used (amount purchased minus amount discarded or recycled) (tons);
- d. Weight percent VOM in fountain solution additive (wt. %);
- e. Weight of manual cleaning solvent used (amount purchased minus amount discarded or recycled) (tons);
- f. Weight percent VOM in manual cleaning solvent (wt. %);
- g. The Permittee shall collect and record the following information each day;

- i. Thermal oxidizer combustion chamber monitoring data.
 - ii. A log of operating time for the capture system, thermal oxidizer, monitoring device, and the associated emission unit(s).
 - iii. A maintenance log for the capture system, thermal oxidizer, and monitoring device detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- h. The aggregate monthly and annual VOM emissions from the affected printing line (tons/month and tons/year); and
- i. Records of the monthly and annual aggregate CO, NO_x, PM, SO₂, and VOM emissions from the press dryer and thermal oxidizer associated with the affected printing line shall be maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

2.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected printing line with the permit requirements as follows. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

None

2.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected printing line 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:

Usage of different inks, fountain solutions, or blanket washes for the affected printing line, provided that the Permittee continues to comply with the conditions of this permit.

2.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 2.1.9 and the emission factors and formulas listed below:

a. Compliance with Condition 2.1.3(c) is assured by the work-practices inherent in operation of a natural gas-fired press dryer and thermal oxidizer.

b. To determine compliance with Condition 2.1.6(a), emissions from the affected printing line shall be calculated based on the following:

Ink VOM Emissions (E_I):

$$E_I = (M_I W_I / 100) (1 - R_I / 100) [1 - (K / 100) (J_I / 100)]$$

Fountain Solution VOM Emissions (E_F):

$$E_F = (M_F W_F / 100)$$

Manual Cleaning Solvent VOM Emissions (E_M):

$$E_M = (M_M W_M / 100) (1 - R_M / 100)$$

Total VOM Emissions (E_T):

$$E_T = E_I + E_F + E_M$$

Where:

M_I = Weight of ink used (amount purchased minus amount discarded or recycled) (pounds)

W_I = Weight percent VOM in ink (wt. %)

R_I = Percent of Ink VOM Retained In Printed Product (20%)

K = Control efficiency of thermal oxidizer* (95%)

J_I = Capture Efficiency Of Dryer and Control System For Ink VOM (100%)

M_F = Volume of fountain solution additive used (amount purchased minus amount discarded or recycled) (gallons)

W_F = Pounds VOM per gallon of fountain solution additive (pounds/gallon)

M_M = Volume of manual cleaning solvent used (amount purchased minus amount discarded or recycled) (gallons)

W_M = Pounds VOM per gallon of manual cleaning solvent (pounds/gallon)

R_M = Percent of Manual Cleaning Solvent VOM retained in wipers (50%)

* As specified by manufacturer or vendor of the thermal oxidizer or by testing pursuant to Condition 2.1.7. Note: if the control device is not being used then $K = 0\%$.

c. Compliance with the emission limits in condition 2.1.6(b) is assured because the dryer and thermal oxidizer emission limits are based on the maximum capacity of the emission unit. As a result, no compliance procedures are set in this permit addressing these requirements.

3a. Emission of volatile organic material from the 32 ink jet printers shall not exceed 1 lb/hour each and 9.9 tons/year combined. Compliance with the annual limit shall be determined from a running total of 12 months of data.

b. The Permittee shall maintain monthly records of the following items to demonstrate compliance with the ink jet printing emission limitation:

i. Material (ink, replenisher, flush) usage (gallons/year);

ii. VOM content of each material used (lb VOM/gallon); and

iii. VOM emissions (tons/month and tons/year).

4. This permit is issued based on negligible emissions of particulate matter from scrap paper collection system 3 controlled by baghouses 1, 2, and 3. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

Please note that the Permittee should update their CAAPP application to include this equipment by submitting form 505-CAAPP - "Supplement to CAAPP Application" along with all other appropriate information.

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

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

DES:JMS:jar

cc: Region 3

217/782-2113

JOINT CONSTRUCTION AND OPERATING PERMIT - REVISED

PERMITTEE

Quebecor Petty Printing Company
Attn: Dave Warren
420 West Industrial Avenue
Post Office Box 250
Effingham, Illinois 62401-2834

Application No.: 99030099

I.D. No.: 049025ABO

Applicant's Designation:

Date Received: February 13, 2002

Subject: Printing Facility

Date Issued: February 25, 2002

Operating Permit Expiration

Date: February 18, 2005

Location: 1200 Niccum Avenue, Effingham and 420 West Industrial Avenue,
Effingham

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

Heatset Web Offset Lithographic Printing Press (OP-201) with Natural Gas Fired Dryer

Heatset Web Offset Lithographic Printing Presses (OP-202), (OP-206), and (OP-211) Each with Natural Gas Fired Dryer with All Three Dryers Controlled by Natural Gas Fired Regenerative Thermal Oxidizer

Heatset Web Offset Lithographic Printing Press (OP-209) with Natural Gas Fired Dryer

Heatset Web Offset Lithographic Printing Press (OP-210) with Natural Gas Fired Dryer

Non-Heatset Web Offset Lithographic Printing Press (OP-10204)

Non-Heatset Web Offset Lithographic Printing Press (OP-10205)

Heatset Web Offset Lithographic Printing Press (OP-10206) with Natural Gas Fired Dryer

Heatset Web Offset Lithographic Printing Press (OP-10207) with Natural Gas Fired Dryer

Non-Heatset Web Offset UV Lithographic Printing Press (OP-10209)

Non-Heatset Web Offset Lithographic Printing Press (OP-10210)

Heatset Web Offset Lithographic Printing Press (OP-30201) with Natural Gas Fired Dryer

Heatset Web Offset Lithographic Printing Press (OP-30202) with Natural Gas Fired Dryer Controlled by Natural Gas Fired Recuperative Thermal Oxidizer

Scrap Paper Collection System #1 with Two Baghouses

Scrap Paper Collection System #2 with Baghouse

as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.1.1 Description

The heatset web offset lithographic printing presses each with a natural gas fired dryer and the non-heatset web offset lithographic printing presses are used to produce printed paper materials, promotionals, and pamphlets. Printing involves the application of ink to the surface of a moving web by a printing press, rapid solvent vaporization by movement of heated air across the wet surface, and solvent-laden air exhausted from the system. Printing inks consist of solvents that are composed of organic compounds. The solvent evaporates from the ink into the atmosphere during the drying process. Fountain solution is used to dampen the image plate and contains solvent. Blanket wash is used for clean-up operations and contains solvent. Emissions of volatile organic material (VOM) from printing operations consist primarily of volatile organic solvents that evaporate from the ink, fountain solution, and blanket wash. Most of the solvent contained in the ink and used for dampening and clean-up is released into the atmosphere, but some ink solvent remains with the printed product. The ink solvent emissions from the heatset web offset lithographic printing presses (OP-202), (OP-206), and (OP-211) each with a natural gas fired dryer are all three controlled by a natural gas fired regenerative thermal oxidizer. The ink solvent emissions from the heatset web offset lithographic printing press (OP-30202) with a natural gas fired dryer is controlled by a natural gas fired recuperative thermal oxidizer. Each heatset web offset lithographic printing press dryer, the regenerative thermal oxidizer, and the recuperative thermal oxidizer burn natural gas as the fuel. Emissions of nitrogen oxides (NO_x) and carbon monoxide (CO) result from the combustion of natural gas.

1.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Rated Heat Input Capacity	Emission Control Equipment
01	Heatset Web Offset Lithographic Printing Press (OP-201) with Natural Gas Fired Dryer	3.33 mmBtu/hr (Dryer)	None
	Heatset Web Offset Lithographic Printing Press (OP-202) with Natural Gas Fired Dryer	3.33 mmBtu/hr (Dryer) 1.4 mmBtu/hr (Oxidizer)	Natural Gas Fired Regenerative Thermal Oxidizer

Emission Unit	Description	Rated Heat Input Capacity	Emission Control Equipment
01 (Cont.)	Heatset Web Offset Lithographic Printing Press (OP-206) with Natural Gas Fired Dryer	3.68 mmBtu/hr (Dryer) 1.4 mmBtu/hr (Oxidizer)	Natural Gas Fired Regenerative Thermal Oxidizer
	Heatset Web Offset Lithographic Printing Press (OP-209) with Natural Gas Fired Dryer	4.44 mmBtu/hr (Dryer)	None
	Heatset Web Offset Lithographic Printing Press (OP-210) with Natural Gas Fired Dryer	4.37 mmBtu/hr (Dryer)	None
	Heatset Web Offset Lithographic Printing Press (OP-211) with Natural Gas Fired Dryer	8.88 mmBtu/hr (Dryer) 1.4 mmBtu/hr (Oxidizer)	Natural Gas Fired Regenerative Thermal Oxidizer
	Non-Heatset Web Offset Lithographic Printing Press (OP-10204)	N/A	None
	Non-Heatset Web Offset Lithographic Printing Press (OP-10205)	N/A	None
02	Heatset Web Offset Lithographic Printing Press (OP-30201) with Natural Gas Fired Dryer	5.92 mmBtu/hr (Dryer)	None
03	Heatset Web Offset Lithographic Printing Press (OP-10206) with Natural Gas Fired Dryer	1.6 mmBtu/hr (Dryer)	None
04	Heatset Web Offset Lithographic Printing Press (OP-10207) with Natural Gas Fired Dryer	3.7 mmBtu/hr (Dryer)	None
05	Non-Heatset Web Offset Lithographic Printing Press (OP-10210)	N/A	None
	Non-Heatset Web Offset UV Lithographic Printing Press (OP-10209)	N/A	None
	Heatset Web Offset Lithographic Printing Press (OP-30202) with Natural Gas Fired Dryer	2.78 mmBtu/hr (Dryer) 2.5 mmBtu/hr (Oxidizer)	Natural Gas Fired Recuperative Thermal Oxidizer

1.1.3 Applicability Provisions and Applicable Regulations

- a. By issuance of this permit, the Illinois EPA has determined that the Permittee's two facilities located in Effingham, as described in the above-referenced application, constitute a single source

as that term is defined in Section 39.5 of the Illinois Environmental Protection Act (415 ILCS 5/39.5).

- b. No owner or operator may cause or allow the operation of a heatset web offset lithographic printing press unless the fountain solution contains no more than eight (8) percent, by weight, of volatile organic material, as applied [35 IAC 215.408(b)].
- c. 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 determined by using the equation [35 IAC 212.321]:

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

Where:

P = Process weight rate; and

E = Allowable emission rate; and,

For process weight rates up to 408 Mg/hr (450 ton/hr):

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

- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].
- e. 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, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- f. The continued operation of the heatset web offset lithographic printing presses (OP-202), (OP-206), and (OP-211) each with natural gas fired dryer during a malfunction or breakdown of the natural gas fired regenerative thermal oxidizer is allowed for a period not to exceed 48 hours per printing press. The Permittee is not required to meet the criteria in 35 IAC 201.262 for continued operation during a malfunction or breakdown because the requirements of 35 IAC 215.408(b) are not being exceeded.

However, total combined VOM emissions from heatset web offset lithographic printing press (OP-201) with natural gas fired dryer, heatset web offset lithographic printing presses (OP-202), (OP-206), and (OP-211) each with natural gas fired dryer, heatset web offset lithographic printing press (OP-209) with natural gas fired dryer, heatset web offset lithographic printing press (OP-210) with natural gas fired dryer, non-heatset web offset lithographic printing press (OP-10204), and non-heatset web offset lithographic printing press (OP-10205) shall not exceed 41.5 tons per month or 249 tons per year, including emissions which occur during malfunction or breakdown. This condition supersedes Standard Condition 9 as it applies to malfunction or breakdown. The Permittee shall maintain the records required by Condition 1.1.9(h).

- g. The continued operation of the heatset web offset lithographic printing press (OP-30202) with natural gas fired dryer during a malfunction or breakdown of the natural gas fired recuperative thermal oxidizer is allowed for a period not to exceed 48 hours. The Permittee is not required to meet the criteria in 35 IAC 201.262 for continued operation during a malfunction or breakdown because the requirements of 35 IAC 215.408(b) are not being exceeded. However, total combined VOM emissions from non-heatset web offset lithographic printing press (OP-10210), non-heatset web offset UV lithographic printing press (OP-10209), and heatset web offset lithographic printing press (OP-30202) with natural gas fired dryer shall not exceed 5.8 tons per month or 35 tons per year, including emissions which occur during malfunction or breakdown. This condition supersedes Standard Condition 9 as it applies to malfunction or breakdown. The Permittee shall maintain the records required by Condition 1.1.9(i).

1.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the heatset web offset lithographic printing presses not being subject to 35 IAC Part 215, Subpart K, Use of Organic Material, because an emission unit achieving compliance with 35 IAC Part 215, Subpart P, Printing and Publishing, is not required to meet 35 IAC Part 215, Subpart K, Use of Organic Material, pursuant to 35 IAC 215.403. Further, the solvents used in heatset web offset lithographic printing are inherently not photochemically reactive material, pursuant to 35 IAC 211.4690.
- b. This permit is issued based on the non-heatset web offset lithographic printing presses not being subject to 35 IAC Part 215, Subpart K, Use of Organic Material, because the solvents used in non-heatset web offset lithographic printing are inherently not photochemically reactive material, pursuant to 35 IAC 211.4690.
- c. This permit is issued based on the heatset web offset lithographic printing presses and the non-heatset web offset lithographic printing presses not being subject to 35 IAC

215.204(c), Paper Coating, because these paper coating limitations shall not apply to equipment used for printing, pursuant to 35 IAC 215.204(c).

1.1.5 Control and Operating Requirements and Work Practices

- a. After beginning of normal operation of the natural gas fired regenerative thermal oxidizer, no owner or operator shall cause or allow the operation of the heatset web offset lithographic printing presses (OP-202), (OP-206), and (OP-211) each with natural gas fired dryer unless:
 - i. The air pressure in the dryers is maintained lower than the air pressure of the press room, such that air flow through all openings in the dryers, other than the exhausts, is into the dryers at all times when the printing lines are operating;
 - ii. The natural gas fired regenerative thermal oxidizer is installed and operated so that VOM emissions from the press dryer exhausts are reduced by 95 percent, by weight, except as provided in Condition 1.1.3(f);
 - iii. The natural gas fired regenerative thermal oxidizer is equipped with the applicable monitoring equipment specified in Condition 1.1.8(d) and the monitoring equipment is installed, calibrated, operated, and maintained according to manufacturer=s specifications at all times when the natural gas fired regenerative thermal oxidizer is in use, except as provided in Condition 1.1.3(f); and
 - iv. The natural gas fired regenerative thermal oxidizer is operated at all times when the printing lines are in operation, except as provided in Condition 1.1.3(f).
- b. No owner or operator shall cause or allow the operation of the heatset web offset lithographic printing press (OP-30202) with natural gas fired dryer unless:
 - i. The air pressure in the dryer is maintained lower than the air pressure of the press room, such that air flow through all openings in the dryer, other than the exhaust, is into the dryer at all times when the printing line is operating;
 - ii. The natural gas fired recuperative thermal oxidizer is installed and operated so that VOM emissions from the press dryer exhaust are reduced by 95 percent, by weight, except as provided in Condition 1.1.3(g);
 - iii. The natural gas fired recuperative thermal oxidizer is equipped with the applicable monitoring equipment specified in Condition 1.1.8(d) and the monitoring

equipment is installed, calibrated, operated, and maintained according to manufacturer=s specifications at all times when the natural gas fired recuperative thermal oxidizer is in use, except as provided in Condition 1.1.3(g); and

- iv. The natural gas fired recuperative thermal oxidizer is operated at all times when the printing line is in operation, except as provided in Condition 1.1.3(g).
- c. No owner or operator shall cause or allow the use of a blanket wash on any lithographic printing line unless the VOM composite partial vapor pressure of the as-used blanket wash is less than 10 mmHg at 20 C (68 F).
- d. No owner or operator shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored, or disposed of in any manner other than in closed containers.
- e. The natural gas fired regenerative thermal oxidizer combustion chamber shall be preheated to at least the temperature at which compliance was demonstrated in the most recent compliance test but no less than 1400 F, before the printing process is begun, and this temperature shall be maintained during operation of the heatset web offset lithographic printing presses (OP-202), (OP-206), and (OP-211) each with natural gas fired dryer, except as provided in Condition 1.1.3(f).
- f. The natural gas fired recuperative thermal oxidizer combustion chamber shall be preheated to at least the temperature at which compliance was demonstrated in the most recent compliance test but no less than 1400 F, before the printing process is begun, and this temperature shall be maintained during operation of the heatset web offset lithographic printing press (OP-30202) with natural gas fired dryer, except as provided in Condition 1.1.3(g).
- g. The Permittee shall follow good operating practices for the natural gas fired regenerative thermal oxidizer and the natural gas fired recuperative thermal oxidizer, including periodic inspection, routine maintenance, and prompt repair of defects.
- h. Natural gas shall be the only fuel fired in the heatset web offset lithographic printing press dryers, the regenerative thermal oxidizer, and the recuperative thermal oxidizer. Use of any other fuel will require a revised permit.
- i. Notwithstanding 35 IAC 215.106, seasonal shutdown of the natural gas fired regenerative thermal oxidizer and the natural gas fired recuperative thermal oxidizer from November 1 through March 31 of the following year is not allowed, except as provided in Conditions 1.1.3(f) and 1.1.3(g).

1.1.6 Emission Limitations

- a. Total combined emissions of VOM and operation of the heatset web offset lithographic printing press (OP-201) with natural gas fired dryer, heatset web offset lithographic printing presses (OP-202), (OP-206), and (OP-211) each with natural gas fired dryer with all three dryers controlled by natural gas fired regenerative thermal oxidizer, heatset web offset lithographic printing press (OP-209) with natural gas fired dryer, heatset web offset lithographic printing press (OP-210) with natural gas fired dryer, non-heatset web offset lithographic printing press (OP-10204), and non-heatset web offset lithographic printing press (OP-10205) shall not exceed the following limits:

<u>Material</u>	Material Usage		VOM	VOM Emissions	
	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>Content (Wt %)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Ink	219	1314	40	30.8	185
Blanket Wash	11	66	100	5.5	33
Fountain Solution	26.3	158	20	<u>5.3</u>	<u>32</u>
Total				41.5	249

These limits are based on the maximum material usage, the maximum VOM contents, 20% by weight heatset ink solvent retention in the web and the remaining 80% evaporated in the dryer, 95% by weight non-heatset ink solvent retention in the web and the remaining 5% evaporated into the atmosphere, 50% by weight blanket wash solvent retention in the rags and the remaining 50% evaporated into the atmosphere, 95% by weight ink solvent destruction efficiency in the natural gas fired regenerative thermal oxidizer as required by Condition 1.1.5(a)(ii) and the remaining 5% evaporated into the atmosphere, and the maximum hours of operation (8,760 hours/year).

- b. Emissions of VOM and operation of the heatset web offset lithographic printing press (OP-30201) with natural gas fired dryer shall not exceed the following limits:

<u>Material</u>	Material Usage		VOM	VOM Emissions	
	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>Content (Wt %)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Ink	51.5	309	40	16.5	99
Blanket Wash	2.7	16	100	1.3	8
Fountain Solution	6.2	37	20	<u>1.2</u>	<u>7</u>
Total				19	114

These limits are based on the maximum material usage, the maximum VOM contents, 20% by weight heatset ink solvent retention in the web and the remaining 80% evaporated in the dryer, 50% by weight blanket wash solvent retention in the rags and the remaining 50%

evaporated into the atmosphere, and the maximum hours of operation (8,760 hours/year).

- c. Emissions of VOM and operation of the heatset web offset lithographic printing press (OP-10206) with natural gas fired dryer shall not exceed the following limits:

<u>Material</u>	Material Usage		VOM Content	VOM Emissions	
	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(Wt %)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Ink	15.8	95	40	5.0	30
Blanket Wash	0.8	5	100	0.5	3
Fountain Solution	2	12	20	<u>0.3</u>	<u>2</u>
Total				5.8	35

These limits are based on the maximum material usage, the maximum VOM contents, 20% by weight heatset ink solvent retention in the web and the remaining 80% evaporated in the dryer, 50% by weight blanket wash solvent retention in the rags and the remaining 50% evaporated into the atmosphere, and the maximum hours of operation (8,760 hours/year).

- d. Emissions of VOM and operation of the heatset web offset lithographic printing press (OP-10207) with natural gas fired dryer shall not exceed the following limits:

<u>Material</u>	Material Usage		VOM Content	VOM Emissions	
	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(Wt %)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Ink	15.8	95	40	5.0	30
Blanket Wash	0.8	5	100	0.5	3
Fountain Solution	2	12	20	<u>0.3</u>	<u>2</u>
Total				5.8	35

These limits are based on the maximum material usage, the maximum VOM contents, 20% by weight heatset ink solvent retention in the web and the remaining 80% evaporated in the dryer, 50% by weight blanket wash solvent retention in the rags and the remaining 50% evaporated into the atmosphere, and the maximum hours of operation (8,760 hours/year).

- e. Total combined emissions of VOM and operation of the non-heatset web offset lithographic printing press (OP-10210), non-heatset web offset UV lithographic printing press (OP-10209), and heatset web offset lithographic printing press (OP-30202) with natural gas fired dryer controlled by natural gas fired recuperative thermal oxidizer shall not exceed the following limits:

<u>Material</u>	Material Usage		VOM	VOM Emissions	
	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>Content</u> <u>(Wt %)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Ink	68.7	412	40	2.5	15
Blanket Wash	3.5	21	100	1.7	10
Fountain Solution	8.3	50	20	<u>1.7</u>	<u>10</u>
Total				5.8	35

These limits are based on the maximum material usage, the maximum VOM contents, 20% by weight heatset ink solvent retention in the web and the remaining 80% evaporated in the dryer, 95% by weight non-heatset ink solvent retention in the web and the remaining 5% evaporated into the atmosphere, 50% by weight blanket wash solvent retention in the rags and the remaining 50% evaporated into the atmosphere, 95% by weight ink solvent destruction efficiency in the natural gas fired recuperative thermal oxidizer as required by Condition 1.1.5(b)(ii) and the remaining 5% evaporated into the atmosphere, and the maximum hours of operation (8,760 hours/year).

- f. 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).
- g. These conditions are based on representations of maximum operation and maximum actual emission rates made in the permit application. As a consequence of the above limitations, this permit is issued based on the construction and modification not constituting a new major source or major modification subject to Prevention of Significant Deterioration (PSD), 40 CFR 52.21.
- h. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP or all HAPs from the non-heatset web offset lithographic printing press (OP-10210), non-heatset web offset UV lithographic printing press (OP-10209), and heatset web offset lithographic printing press (OP-30202) with natural gas fired dryer controlled by natural gas fired recuperative thermal oxidizer not triggering the requirements of Section 112(G) of the Clean Air Act.
- i. This permit is issued based on negligible emissions of particulate matter from the scrap paper collection system #1 with two baghouses and the scrap paper collection system #2 with baghouse. For this purpose, emissions from each baghouse shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

1.1.7 Testing Requirements

- a. Testing to demonstrate compliance with the requirements of Conditions 1.1.3(b), 1.1.5(a), 1.1.5(b), and 1.1.5(c) 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. The methods and procedures of 35 IAC 218.105(d) and (f) shall be used for testing to demonstrate compliance with the requirements of Conditions 1.1.5(a)(ii) and 1.1.5(b)(ii), as follows:
 - i. To select the sampling sites, Method 1 or 1A, as appropriate, 40 CFR Part 60, Appendix A. The sampling sites for determining efficiency in reducing VOM from the dryer exhaust shall be located between the dryer exhaust and the control device inlet, and between the outlet of the control device and the exhaust to the atmosphere;
 - ii. To determine the volumetric flow rate of the exhaust stream, Method 2, 2A, 2C, or 2D, as appropriate, 40 CFR Part 60, Appendix A;
 - iii. To determine the VOM concentration of the exhaust stream entering and exiting the control device, Method 25 or 25A, as appropriate, 40 CFR Part 60, Appendix A. For thermal afterburners, Method 25 must be used except under the following circumstances, in which case Method 25A must be used:
 - A. The allowable outlet concentration of VOM from the control device is less than 50 ppmv, as carbon;
 - B. The VOM concentration at the inlet of the control device and the required level of control result in exhaust concentrations of VOM of 50 ppmv, or less, as carbon; and
 - C. Due to the high efficiency of the control device, the anticipated VOM concentration at the control device exhaust is 50 ppmv or less, as carbon, regardless of inlet concentration. If the source elects to use Method 25A under this option, the exhaust VOM concentration must be 50 ppmv or less, as carbon, and the required destruction efficiency must be met for the source to have demonstrated compliance. If the Method 25A test results show that the required destruction efficiency apparently has been met, but the exhaust concentration is above 50 ppmv, as carbon, a retest is required. The retest shall be conducted using either Method 25 or Method 25A. If

the retest is conducted using Method 25A and the test results again show that the required destruction efficiency apparently has been met, but the exhaust concentration is above 50 ppmv, as carbon, the source must retest using Method 25;

- iv. Notwithstanding the criteria or requirements in Method 25 which specifies a minimum probe temperature of 129 C (265 F), the probe must be heated to at least the gas stream temperature of the dryer exhaust, typically close to 176.7 C (350 F);
 - v. During testing, the printing line(s) shall be operated at representative operating conditions and flow rates; and
 - vi. During testing, an air flow direction indicating device, such as a smoke stick, shall be used to demonstrate that the air pressure in the dryers is lower than the air pressure of the press room, so as to assume approximately 100 percent emissions capture efficiency for the dryer, in accordance with Conditions 1.1.5(a)(i) and 1.1.5(b)(i).
- c. Testing to demonstrate compliance with the VOM content limitations in Condition 1.1.3(b), and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, blanket washes, and inks, shall be conducted upon request of the Illinois EPA, as follows:
- i. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used; provided, however, Method 24, 40 CFR Part 60, Appendix A, shall be used to demonstrate compliance; or
 - ii. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, blanket washes, and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a); provided, however, Method 24, 40 CFR Part 60, Appendix A, shall be used to determine compliance.
- d. Testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used blanket washes shall be conducted in accordance with the applicable methods and procedures specified in 35 IAC 218.110.

1.1.8 Monitoring Requirements

- a. Fountain Solution VOM Content. The owner or operator of any lithographic printing line(s) subject to Condition 1.1.3(b) shall:

Determine the VOM content of the as-applied fountain solution by daily conductivity testing of that fountain solution.

- b. Afterburners For Heatset Web Offset Lithographic Printing Line(s). If an afterburner is used to demonstrate compliance, the owner or operator of a heatset web offset lithographic printing line subject to Conditions 1.1.5(a)(ii) and 1.1.5(b)(ii) shall:
 - i. Install, calibrate, maintain, and operate temperature monitoring device(s) with an accuracy of 3 C or 5 F on the afterburner in accordance with Condition 1.1.8(d) and in accordance with the manufacturer's specifications. Monitoring shall be performed at all times when the afterburner is operating, except as provided in Conditions 1.1.3(f) and 1.1.3(g); and
 - ii. Install, calibrate, operate, and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device(s), such as a strip chart, recorder, or computer, with at least the same accuracy as the temperature monitor.
- c. Cleaning Solution.

The owner or operator of any lithographic printing line relying on the vapor pressure of the blanket wash to comply with Condition 1.1.5(c) must keep records for such blanket washes used on any such line(s) as set forth in Condition 1.1.9(c)(i).
- d. An owner or operator that uses an afterburner to comply with Conditions 1.1.5(a) and 1.1.5(b) shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use, except as provided in Conditions 1.1.3(f) and 1.1.3(g). The continuous monitoring equipment must monitor the combustion chamber temperature of each afterburner.

1.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for each lithographic printing line to demonstrate compliance with Conditions 1.1.3, 1.1.5, 1.1.6, 1.1.7, and 1.1.8:

- a. An owner or operator of a heatset web offset lithographic printing line(s) subject to the control requirements of Conditions 1.1.5(a)(ii) and 1.1.5(b)(ii) shall collect and record daily the following information for each heatset web offset lithographic printing line subject to the requirements of Conditions 1.1.5(a)(ii) and 1.1.5(b)(ii):
 - i. Afterburner monitoring data in accordance with Condition 1.1.8(b);

- ii. A log of operating time for the afterburner, monitoring equipment, and the associated printing line;
 - iii. A maintenance log for the afterburner and monitoring equipment detailing all routine and non-routine maintenance performed, including dates and duration of any outages; and
 - iv. A log detailing checks on the air flow direction or air pressure of the dryer and press room to insure compliance with the requirements of Conditions 1.1.5(a)(i) and 1.1.5(b)(i) at least once per 24-hour period while the line is operating. Such checks shall consist of visual observations only. The absence of smoke in the press room during the daily checks shall demonstrate that the air pressure in the dryers is being maintained at levels lower than the air pressure of the press room, in accordance with Conditions 1.1.5(a)(i) and 1.1.5(b)(i).
- b. An owner or operator of a lithographic printing line subject to Condition 1.1.3(b), shall collect and record the following information for each fountain solution:
- i. The name and identification of each batch of fountain solution prepared for use on one or more lithographic printing lines, the lithographic printing line(s) or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch; and
 - ii. Documentation of the periodic calibration of the automatic feed equipment in accordance with the manufacturer's specifications, including date and time of calibration, personnel conducting, and resultant setting.
- c. For lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of Conditions 1.1.5(c) and 1.1.5(d) shall collect and record the following information for each blanket wash used on each lithographic printing line:
- i. For each batch of blanket wash for which the owner or operator relies on the vapor pressure of the blanket wash to demonstrate compliance with Condition 1.1.5(c):
 - A. The name and identification of each blanket wash;
 - B. Date and time of preparation, and each subsequent modification, of the batch;
 - C. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with Condition 1.1.7(d);

- D. The total amount of each cleaning solvent used to prepare the as-used blanket wash; and
 - E. The VOM composite partial vapor pressure of each as-used blanket wash, as determined in accordance with Condition 1.1.7(d).
- ii. 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.
- d. An owner or operator of lithographic printing line(s) shall collect and record the following information for each lithographic printing line at the source and each emission unit as identified in Condition 1.1.2:
- i. The name and identification of each fountain solution additive, lithographic ink, and blanket wash used on any lithographic printing line, recorded each month;
 - ii. The volume of each fountain solution additive, lithographic ink, and blanket wash used on any lithographic printing line, recorded each month (ton/month and ton/year);
 - iii. The VOM content of each fountain solution additive, lithographic ink, and blanket wash used on any lithographic printing line, recorded each month (percent by weight);
 - iv. Monthly and annual aggregate VOM emissions, based on the usage and VOM content for each fountain solution additive, lithographic ink, and blanket wash used at the source and the compliance procedures in Condition 1.1.12(i), with supporting calculations (ton/month and ton/year); and
 - v. Monthly and annual aggregate VOM emissions, based on the usage and VOM content for each fountain solution additive, lithographic ink, and blanket wash used at the source and the compliance procedures in Condition 1.1.12(i), during malfunction or breakdown of the natural gas fired regenerative thermal oxidizer and the natural gas fired recuperative thermal oxidizer, with supporting calculations (ton/month and ton/year).
- e. Records addressing use of good operating practices for the natural gas fired regenerative thermal oxidizer and the natural gas fired recuperative thermal oxidizer:
- i. Records for periodic inspection of the natural gas fired regenerative thermal oxidizer and the natural gas fired

- recuperative thermal oxidizer with date, individual performing the inspection, nature of inspection, and results of emission testing, if any were made; and
- ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- f. Records of the testing of the destruction efficiency of each afterburner pursuant to Conditions 1.1.7(a) and 1.1.7(b) which include the following:
- i. The date, place, and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions as existing at the time of sampling or measurement.
- g. Records of the testing of VOM content of inks, fountain solutions, and blanket washes pursuant to Conditions 1.1.7(a), 1.1.7(c), and 1.1.7(d), which include the following:
- i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.
- h. The Permittee shall maintain records, pursuant to 35 IAC 201.263, of continued operation of the heatset web offset lithographic printing presses (OP-202), (OP-206), and (OP-211) each with natural gas fired dryer subject to Condition 1.1.3(f) during a malfunction or breakdown of the natural gas fired regenerative thermal oxidizer, which as a minimum, shall include:
- i. Date and duration of malfunction or breakdown;
 - ii. A full and detailed explanation of the malfunction or breakdown;
 - iii. The contaminants emitted and an estimate of the quantity of emissions;
 - iv. The measures used to reduce the quantity of emissions and the duration of the occurrence; and

- v. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity.
- i. The Permittee shall maintain records, pursuant to 35 IAC 201.263, of continued operation of the heatset web offset lithographic printing press (OP-30202) with natural gas fired dryer subject to Condition 1.1.3(g) during a malfunction or breakdown of the natural gas fired recuperative thermal oxidizer, which as a minimum, shall include:
 - i. Date and duration of malfunction or breakdown;
 - ii. A full and detailed explanation of the malfunction or breakdown;
 - iii. The contaminants emitted and an estimate of the quantity of emissions;
 - iv. The measures used to reduce the quantity of emissions and the duration of the occurrence; and
 - v. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity.
- j. Natural gas consumption (mmft³/month and mmft³/year).
- k. Monthly and annual aggregate NOx and CO emissions from the combustion of natural gas in the heatset web offset lithographic printing press dryers, the regenerative thermal oxidizer, and the recuperative thermal oxidizer, based on natural gas consumption and the applicable emission factors from Condition 1.1.12(h), with supporting calculations (ton/month and ton/year).
- l. The owner or operator shall maintain all records required by Condition 1.1.9 at the source for a minimum period of three years and shall make all records available to the Illinois EPA upon request.

1.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of a lithographic printing line with the permit requirements as follows. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. An owner or operator of a heatset web offset lithographic printing line(s) subject to the control requirements of Conditions 1.1.5(a)(ii) and 1.1.5(b)(ii) shall comply with the following:
 - i. If testing of the afterburner is conducted pursuant to Condition 1.1.7(b), the owner or operator shall, within 90

days after conducting such testing, submit a copy of all test results to the Illinois EPA and shall submit a certification to the Illinois EPA that includes the following:

- A. A declaration that all tests and calculations necessary to demonstrate whether the lithographic printing line(s) is in compliance with Conditions 1.1.5(a)(ii) and 1.1.5(b)(ii) have been properly performed;
 - B. A statement whether the lithographic printing line(s) is or is not in compliance with Conditions 1.1.5(a)(ii) and 1.1.5(b)(ii); and
 - C. The operating parameters of the afterburner during testing, as monitored in accordance with Condition 1.1.8(b).
- ii. Notify the Illinois EPA in writing of any violation of Conditions 1.1.5(a)(ii) and 1.1.5(b)(ii) within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation.
- b. An owner or operator of a lithographic printing line subject to Condition 1.1.3(b), shall notify the Illinois EPA in writing of any violation of Condition 1.1.3(b) within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation.
 - c. For lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of Conditions 1.1.5(c) and 1.1.5(d) shall notify the Illinois EPA in writing of any violation of Conditions 1.1.5(c) and 1.1.5(d) within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation.
 - d. VOM emissions, VOM contents, and material usage in excess of the emission limits specified in Condition 1.1.6 based on the current month's records plus the preceding 11 months, within 30 days of such an occurrence.
 - e. The Permittee shall notify the Illinois EPA within 30 days of a change in fuel combusted in the heatset web offset lithographic printing press dryers, the regenerative thermal oxidizer, and the recuperative thermal oxidizer.
 - f. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records,

and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

- g. The Permittee shall provide the following notification and reports to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to 35 IAC 201.263, concerning continued operation of the heatset web offset lithographic printing presses (OP-202), (OP-206), and (OP-211) each with natural gas fired dryer subject to Condition 1.1.3(f) during a malfunction or breakdown of the natural gas fired regenerative thermal oxidizer:
- i. The Permittee shall notify the Illinois EPA's regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence of noncompliance due to malfunctions or breakdowns. The Permittee shall comply with all reasonable and safe directives of the regional office regarding such malfunctions and breakdowns.
 - ii. Upon achievement of compliance, the Permittee shall give a written follow-up notice to the Illinois EPA, Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation of the heatset web offset lithographic printing presses (OP-202), (OP-206), and (OP-211) each with natural gas fired dryer was necessary, the length of time during which operation continued under such conditions, the measures taken by the Permittee to minimize excess emissions and correct deficiencies with chronology, and when the repairs were completed or when the heatset web offset lithographic printing presses (OP-202), (OP-206), and (OP-211) each with natural gas fired dryer were taken out of service.
 - iii. If compliance is not achieved within five (5) working days of the occurrence, the Permittee shall submit interim status reports to the Illinois EPA, Compliance Section and Regional Field Office, within five (5) days of the occurrence and every fourteen (14) days thereafter, until compliance is achieved. These interim reports shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to occur with schedule, and the expected date on which repairs will be complete or the heatset web offset lithographic printing presses (OP-202), (OP-206), and (OP-211) each with natural gas fired dryer will be taken out of service.
- h. The Permittee shall provide the following notification and reports to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to 35 IAC 201.263, concerning continued operation of the heatset web offset lithographic printing press (OP-30202) with natural gas fired dryer subject to Condition

1.1.3(g) during a malfunction or breakdown of the natural gas fired recuperative thermal oxidizer:

- i. The Permittee shall notify the Illinois EPA=s regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence of noncompliance due to malfunctions or breakdowns. The Permittee shall comply with all reasonable and safe directives of the regional office regarding such malfunctions and breakdowns.
 - ii. Upon achievement of compliance, the Permittee shall give a written follow-up notice to the Illinois EPA, Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation of the heatset web offset lithographic printing press (OP-30202) with natural gas fired dryer was necessary, the length of time during which operation continued under such conditions, the measures taken by the Permittee to minimize excess emissions and correct deficiencies with chronology, and when the repairs were completed or when the heatset web offset lithographic printing press (OP-30202) with natural gas fired dryer was taken out of service.
 - iii. If compliance is not achieved within five (5) working days of the occurrence, the Permittee shall submit interim status reports to the Illinois EPA, Compliance Section and Regional Field Office, within five (5) days of the occurrence and every fourteen (14) days thereafter, until compliance is achieved. These interim reports shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to occur with schedule, and the expected date on which repairs will be complete or the heatset web offset lithographic printing press (OP-30202) with natural gas fired dryer will be taken out of service.
- i. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing, or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
1340 North Ninth Street
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
2009 Mall Street
Collinsville, Illinois 62234

- j. The Permittee shall submit an Annual Emissions Report to the Illinois EPA by May 1st of each year.

1.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the lithographic printing lines 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:

Usage of different inks, fountain solutions, or blanket washes at this source, provided that the Permittee continues to comply with Conditions 1.1.3(b), 1.1.5(c), and 1.1.6 of this permit.

1.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 1.1.9 and the emission factors and formulas listed below:

- a. Compliance with the VOM emission limits in Condition 1.1.3(b) is addressed by the testing requirements in Conditions 1.1.7(a) and 1.1.7(c), the monitoring requirements in Condition 1.1.8(a), the recordkeeping requirements in Conditions 1.1.9(b) and 1.1.9(g), and the reporting requirements in Condition 1.1.10(b).
- b. Compliance with the emission limits in Conditions 1.1.3(c), 1.1.3(d), and 1.1.3(e) is assumed to be achieved under inherent operating conditions of a lithographic printing line, so that no compliance procedures are set in this permit addressing these requirements.
- c. Compliance with the VOM emission limits in Condition 1.1.3(f) is addressed by the recordkeeping requirements in Conditions 1.1.9(d) and 1.1.9(h) and the reporting requirements in Condition 1.1.10.
- d. Compliance with the VOM emission limits in Condition 1.1.3(g) is addressed by the recordkeeping requirements in Conditions 1.1.9(d) and 1.1.9(i) and the reporting requirements in Condition 1.1.10.
- e. Compliance with the control requirements in Conditions 1.1.5(a) and 1.1.5(b) is addressed by proper operation of the natural gas fired regenerative thermal oxidizer and the natural gas fired recuperative thermal oxidizer, the operating requirements in

Conditions 1.1.5(e), 1.1.5(f), and 1.1.5(i), the work practice requirements in Condition 1.1.5(g), the testing requirements in Conditions 1.1.7(a) and 1.1.7(b), the monitoring requirements in Conditions 1.1.8(b) and 1.1.8(d), the recordkeeping requirements in Conditions 1.1.9(a), 1.1.9(e), and 1.1.9(f), and the reporting requirements in Condition 1.1.10.

- f. Compliance with the VOM emission limits in Condition 1.1.5(c) is addressed by the testing requirements in Conditions 1.1.7(a) and 1.1.7(d), the monitoring requirements in Condition 1.1.8(c), the recordkeeping requirements in Conditions 1.1.9(c)(i) and 1.1.9(g), and the reporting requirements in Condition 1.1.10(c).
- g. Compliance with the work practice requirements in Condition 1.1.5(d) is addressed by the recordkeeping requirements in Condition 1.1.9(c)(ii) and the reporting requirements in Condition 1.1.10(c).
- h. Compliance with the operating requirements in Condition 1.1.5(h) from the combustion of natural gas in the heatset web offset lithographic printing press dryers, the regenerative thermal oxidizer, and the recuperative thermal oxidizer shall be based on the recordkeeping requirements in Conditions 1.1.9(j) and 1.1.9(k), the reporting requirements in Condition 1.1.10(e), and the emission factors and formula listed below:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/mmft³)</u>
NO _x	100
CO	84

These are the emission factors for uncontrolled natural gas combustion in small boilers with less than 100 mmBtu/hr of heat input, Table 1.4-1, AP-42, Volume I, Supplement D, March, 1998.

$$\text{Combustion Emissions (ton)} = (\text{Natural gas consumption, mmft}^3) \times (\text{the applicable emission factor, lb/mmft}^3) \times (\text{ton}/2000 \text{ lb})$$

- i. Compliance with the VOM emission limits in Condition 1.1.6 from the lithographic printing lines shall be based on the control requirements in Conditions 1.1.5(a)(ii) and 1.1.5(b)(ii), the testing requirements in Condition 1.1.7(c), the recordkeeping requirements in Conditions 1.1.9(d) and 1.1.9(g), the reporting requirements in Condition 1.1.10(d), and the formulas listed below:

- i. Heatset web offset lithographic printing line:

$$\text{Uncontrolled Heatset VOM Emissions (ton)} = (\text{Ink VOM emissions, ton}) + (\text{blanket wash VOM emissions, ton}) + (\text{fountain solution VOM emissions, ton})$$

Ink VOM Emissions (ton) = (Heatset ink usage, ton) x
(heatset ink VOM content, wt %) x (0.8)*

* Heatset ink emission adjustment factor for VOM
retention in the substrate based on USEPA=s
Alternative Control Techniques Document for Offset
Lithographic Printing, November 8, 1993

Blanket Wash VOM Emissions (ton) = (Blanket wash usage,
ton) x (blanket wash VOM content, wt %) x (0.5)**

** Blanket wash emission adjustment factor for VOM
retention in the rags based on USEPA=s Alternative
Control Techniques Document for Offset Lithographic
Printing, June, 1994

Fountain Solution VOM Emissions (ton) = (Fountain solution
usage, ton) x (fountain solution VOM content, wt %)

ii. Heatset web offset lithographic printing line controlled
by afterburner:

Controlled Heatset VOM Emissions (ton) = (Ink VOM
emissions, ton) + (blanket wash VOM emissions, ton) +
(fountain solution VOM emissions, ton)

Ink VOM Emissions (ton) = (Heatset ink usage, ton) x
(heatset ink VOM content, wt %) x (0.8)* x [1 B
(destruction efficiency***, % / 100)]

* Heatset ink emission adjustment factor for VOM
retention in the substrate based on USEPA=s
Alternative Control Techniques Document for Offset
Lithographic Printing, November 8, 1993

*** As determined by the most recent stack test

Blanket Wash VOM Emissions (ton) = (Blanket wash usage,
ton) x (blanket wash VOM content, wt %) x (0.5)**

** Blanket wash emission adjustment factor for VOM
retention in the rags based on USEPA=s Alternative
Control Techniques Document for Offset Lithographic
Printing, June, 1994

Fountain Solution VOM Emissions (ton) = (Fountain solution
usage, ton) x (fountain solution VOM content, wt %)

iii. Non-heatset web offset lithographic printing line:

Non-heatset VOM Emissions (ton) = (Ink VOM emissions, ton)
+ (blanket wash VOM emissions, ton) + (fountain solution
VOM emissions, ton)

Ink VOM Emissions (ton) = (Non-heatset ink usage, ton) x (non-heatset ink VOM content, wt %) x (0.05)****

**** Non-heatset ink emission adjustment factor for VOM retention in the substrate based on USEPA=s Alternative Control Techniques Document for Offset Lithographic Printing, November 8, 1993

Blanket Wash VOM Emissions (ton) = (Blanket wash usage, ton) x (blanket wash VOM content, wt %) x (0.5)**

** Blanket wash emission adjustment factor for VOM retention in the rags based on USEPA=s Alternative Control Techniques Document for Offset Lithographic Printing, June, 1994

Fountain Solution VOM Emissions (ton) = (Fountain solution usage, ton) x (fountain solution VOM content, wt %)

iv. Total combined VOM emissions:

VOM Emissions (ton) = (Uncontrolled heatset VOM emissions, ton) + (controlled heatset VOM emissions, ton) + (non-heatset VOM emissions, ton)

Please note that this permit supersedes and replaces all construction and operating permits previously issued by the Illinois EPA for emission units at the source.

Please note that the Permittee should update their CAAPP application to include this equipment by submitting form 505-CAAPP - "Supplement to CAAPP Application" along with all other appropriate information.

It should be noted that this permit has been revised to change the monitoring requirements for fountain solution VOM content (See also Condition 1.1.8(a)).

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

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

DES:JMS:psj

cc: Region 3
Robb Layman, DLC

10.3 Attachment 3 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: _____

10.4 Attachment 4 Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment

- Corrects typographical errors;
- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- Requires more frequent monitoring or reporting by the Permittee;
- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	ID number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. ID number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24. Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25. Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26. Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28. Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29. If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	_____
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.6 Attachment 6 Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

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

WDM:psj