

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Catty Corporation
Attn: William P. Schmiederer
11117 South Church Street
Huntley, Illinois 60142

<u>Application No.:</u> 00100006	<u>I.D. No.:</u> 111803AAF
<u>Applicant's Designation:</u> CHE MUNG	<u>Date Received:</u> March 29, 2001
<u>Subject:</u> Rotogravure Printing Press	
<u>Date Issued:</u> July 26, 2001	<u>Expiration Date:</u> July 26, 2006
<u>Location:</u> 6111 White Oaks Road, Harvard	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of one Rotogravure Printing Press pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons per year of VOM, 25 tons per year of HAPs and 10 tons per year of single HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. 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, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
3. This permit is issued based on potential emissions of combined hazardous air pollutants (HAPs) and each single HAP from the rotogravure printing press not exceeding 25 tons per year and 10 tons per year, respectively. For this reason, the press is not subject to National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart KK: Printing and Publishing, pursuant to 40 CFR 63.820(a)(1).

4. This permit is also issued based on the rotogravure printing press not meeting the definition of a Publication Rotogravure Printing Press, pursuant to New Source Performance Standards (NSPS), Subpart QQ: Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60.431a, thereby exempting the source from NSPS, Subpart QQ.
5. At all times, the Permittee shall also, to the extent practicable, maintain and operate the rotogravure printing press, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
6. The rotogravure printing press is subject to Title 35, Part 218, Subpart H: Printing and Publishing. Pursuant to 218.401(a)(2), the Permittee, shall not apply at any time any coating or ink with a VOM content which exceeds twenty-five percent VOM by volume of the volatile content in the ink as determined through the applicable ink analysis test methods and procedures specified in Section 218.105.
- 7a. Emissions and operation of equipment, including clean-up, shall not exceed the following limits:

<u>VOM Usage and Emissions</u> (Tons/Month)	<u>(Tons/Year)</u>	<u>Total HAP Usage and Emissions</u> (Tons/Month)	<u>(Tons/Year)</u>						
2	24	2	24						
<table style="width: 100%; border-collapse: collapse; margin: 10px auto;"> <thead> <tr> <th colspan="2" style="text-align: center;"><u>Single HAP Usage and Emissions</u></th> </tr> <tr> <th style="text-align: center;"><u>(Tons/Month)</u></th> <th style="text-align: center;"><u>(Tons/Year)</u></th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">0.8</td> <td style="text-align: center;">9.6</td> </tr> </tbody> </table>				<u>Single HAP Usage and Emissions</u>		<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	0.8	9.6
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<u>(Tons/Month)</u>	<u>(Tons/Year)</u>								
0.8	9.6								

These limits are based on maximum material usage and VOM and HAP contents.

- b. Emissions shall be determined as follows:

$$E = \sum(I_i \times C_i) + \sum(S_j \times C_j) - \sum(W_p \times C_p) / 2,000$$

E = VOM emissions (tons/month)

I_i = Ink usage of each type on the controlled presses (gallon/month)

C_i = VOM content in the ink of each type, as applied on the controlled presses (lb/gallon)

S_j = Clean-up solvent usage of each type (gallon/month)

C_j = VOM content of the clean-up solvent of each type (lb/gallon)

W_p = Certified amount of waste shipped off for disposal (gallon/month)

C_p = Certified VOM content of the waste (lb/gallon)

- c. Organic HAP emissions shall be calculated using the equation in Condition 3(b) substituting VOM content with HAP content.
 - 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.
8. The Permittee shall maintain monthly records of the following items:
- a. Names and amount of inks used (gallon/month) and their VOM and HAP contents;
 - b. Names and amount of solvent used for clean-up (gallon/month) and their VOM and HAP content (lb/gallon); and
 - c. VOM and HAP emissions for preceding month (tons/month) and preceding 12 months (tons/year).
9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
11. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

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

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

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

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12. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: Names and amounts of inks used (gallon/month) and their VOM and HAP contents (lb/gallon); names and amounts of solvents used for clean-up (gallon/month) and their VOM and HAP contents (lb/gallon); and VOM and HAP emissions for preceding 12 months.

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

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

DES:RBS:psj

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

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

1. Emissions and operation of equipment, including clean-up, shall not exceed the following limits:

<u>VOM Usage and Emissions</u>		<u>Total HAP Usage and Emissions</u>	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
2	24	2	24
<u>Single HAP Usage and Emissions</u>			
<u>(Tons/Month)</u>		<u>(Tons/Year)</u>	
0.8		9.6	

2. 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, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

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