

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Plastag Holdings, L.L.C.
Attn: Tom Richardson
1800 Greenleaf Avenue
Elk Grove Village, Illinois 60007

<u>Application No.:</u> 98080034	<u>I.D. No.:</u> 031440ALR
<u>Applicant's Designation:</u>	<u>Date Received:</u> November 18, 2005
<u>Subject:</u> Printing Facility	
<u>Date Issued:</u>	<u>Expiration Date:</u> July 9, 2009
<u>Location:</u> 1800 Greenleaf, Elk Grove Village	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of four coldset lithographic, eight flexographic, four letter and six silk screen printing presses and four laminators pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of volatile organic material (VOM) from the source to less than major source thresholds (i.e., 100 tons/year). As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of the plants, as limited by the conditions of this permit are described in Attachment A.
 - ii. To limit emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year to less than 15 tons. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205, except reporting requirements of Section 205.300.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits for this location.
- 2a. Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205, except reporting requirements of Section 205.300.

- b. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and beginning with the following seasonal allotment period, shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period as described in Attachment B.
3. This permit is issued based upon the lithographic printing presses being exempt from the requirements of 35 Ill. Adm. Code Part 218, Subpart H: Printing and Publishing, Section 218.407: Emission and Control Requirements for Lithographic Printing Lines On and After March 15, 1996. This is consequence of the combined daily emission rate of VOM from subject presses never exceeding an applicability threshold of 100 lb/day (including solvents used for cleanup operations associated with the lithographic printing line(s)) established by Section 218.405(d)(2) and determined in accordance with Section 218.411(a)(1)(B).
4. This permit is issued based upon the flexographic and letter printing presses not being subject to the VOM control requirements of 35 Ill. Adm. Code 218.401: Flexographic and Rotogravure Printing. This is consequence of the federally enforceable limitations of this permit limiting Potential to Emit and Maximum Theoretical Emissions of VOM to less than applicability threshold of 25 tons per year and 100 tons year, respectively, as established in Section 218.402(a).
5. The VOM emissions from the source operations shall not exceed the following limits:
 - a. The VOM emissions from coldset lithographic printing presses shall not exceed 100 lb/day, 2.0 tons/month and 14.7 tons/year.
 - b. The VOM emissions from flexographic and letter printing presses shall not exceed 0.7 tons/month and 4.7 tons/year.
 - c. The VOM emissions from silk screen printing presses and laminators shall not exceed 2.8 ton/mo and 13.7 ton/yr.

The VOM emissions shall be determined from the following equation on a monthly basis:

$$\Sigma(M_{1i} \times C_{1i}) - \Sigma(W_{1j} \times C_{1j}) / 2.000, \text{ Where:}$$

- E - VOM emissions (tons);
- M_i - VOM-containing raw material usage (gal/month)
- C_i - VOM content of the raw material (lb/gal)
- W_j - Waste material shipped off-site (gal/month)
- C_j - VOM content of the waste material (lb/gal)

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.

6. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP) permit.
7. The Permittee shall maintain monthly records of the following items:
 - a. Names and amounts (gal/mo, gal/yr) of VOM-containing raw materials used;
 - b. VOM content of materials in item (a) (lb/gal);
 - c. The number of days during that calendar month that lithographic printing lines were in operation;
 - d. Certified amount of waste shipped off-site (gal/mo) and its VOM content (lb/gal);
 - e. VOM emissions calculations for lithographic printing presses to demonstrate an exemption level of the daily VOM emissions performed pursuant to the procedures of Section 218.411 (a) (1) (B). An ink emission adjustment factor, specified in 218.411(a) (1) (B) (iii), shall not be used because of absence of VOM retention in the plastic substrate; and
 - f. VOM and HAP emission calculations for total facility (ton/mo, ton/yr).
8. 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.
9. If there is an exceedance of the requirements of this permit, as determined by the record 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, a copy of the relevant records, and a description of the exceedance or violation, and efforts to reduce emissions and future occurrences.
10. 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

It should be noted that this permit has been revised to include operations of thirteen printing presses described in Construction permit 05080011.

It should also be noted that this permit has been revised so to establish a 15 ton seasonal limit for VOM emissions in order to exempt the source from the Emission Reduction Market System (ERMS).

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

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

DES:VJB:

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

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

EMISSIONS (Tons/Yr)

Emission Units	VOM	Single HAP	Total HAP
Lithographic Presses	14.7	--	--
Flexographic and Letter Presses	4.7	--	--
Silk Screen Presses/Laminators	13.7	--	--
Totals:	33.1	10	25

DES:VJB:lsm

Attachment B - Emissions Reduction Market System (ERMS)

1. Description of ERMS

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

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

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

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

2. Applicability

Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons, not including VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205.

3. Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to determine compliance with the above limitation:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.
- b. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by November 30 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 Ill. Adm. Code 205.205(b) and 35 Ill. Adm. Code 205.300.
- c. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and beginning with the following seasonal allotment period, shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period.

VJB:lsm