

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT **B** RENEWAL

PERMITTEE

NB/Microseal Division of Bell & Howell
Document Management Product Company
Attn: Louis J. Manetti
2000 Lewis Avenue
Zion, Illinois 60099

Application No.: 95010002

I.D. No.: 097200ABA

Applicant's Designation: PLNT FESOP

Date Received: May 26, 2000

Subject: Gravure Printing Lines

Date Issued: September 12, 2000

Expiration Date: September 12, 2005

Location: 2000 Lewis Avenue, Zion

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of eight Rotogravure printing presses (E-1, E-2, E-3, E-4, E-5, N-6, N-7, and N-8) as described in 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/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAP). 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. This permit is issued based upon the plant being exempt from the limitations of 35 Ill. Adm. Code Subpart H: "Flexographic and Rotogravure Printing". This is a consequence of the federally enforceable production and operating limitations, which restrict a potential to emit of VOM to less than applicability threshold level of 25 tons per year from the subject sources.
3. Operation and VOM emissions of Rotogravure printing lines shall not exceed the following limits:

Material Usage VOM Content VOM Emissions

<u>Materials</u>	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb VOM/Gal)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Inks (Lines E-1, E-2, E-3, E-4 and E-5)	465	4164	5.94	1.38	12.37

<u>Materials</u>	<u>Material Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb VOM/Gal)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Inks (Lines N-6, N-7 and N-8)	244	2340	5.55	0.68	6.49
Propanol Cleanup	60	450	6.71	0.20	1.50
Chip Dying	70	550	6.58	0.23	1.80
Miscellan. Cleanup	65	525	6.75	0.22	1.77
				Total 23.93	

These limits define the potential emissions of VOM and HAPs and are based on the actual emissions determined from maximum production capacity. Compliance with annual limits shall be determined from the sum of data for the current month plus the preceding 11 months.

4. The emissions of 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 by rule which would require the Permittee to obtain a Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.
5. The Permittee shall maintain monthly records of the following items:
 - a. The name, identification number and amount (Gal/Mo and Gal/Yr) of each ink used on each printing line;
 - b. VOM and HAP contents of each ink (lb/gal), as applied, on each printing line;
 - c. The name, identification number and amount (Gal/Mo and Gal/Yr) of solvents used;
 - d. VOM and HAP content of solvents (lb/gal);
 - e. VOM and HAP emissions (Ton/Mo and Ton/Yr).
6. 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 and 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 the Illinois EPA or USEPA request for records during the

course of a source inspection.

7. 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.
8. The Permittee shall submit the following additional information with the Annual Emission Report, due May 1st of each year: annual ink and solvent usage (gal/yr) from the prior calendar year.
9. 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, IL 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 - Regional Office
Eisenhower Tower
1701 First Avenue
Maywood, Illinois 60153

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:psj

cc. Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
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. This is a usage of 6,504 gallons of inks and 1,525 gallons of solvents per year. The resulting maximum emissions from subject emission units are well below the levels, e.g., 25 tons per year of VOM, 10 tons/year for a single HAP and 25 tons/year for totaled HAP, at which these units would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from these units 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.

1. Operation and VOM emissions of Rotogravure printing lines shall not exceed the following limits:

<u>Materials</u>	<u>Ink Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb VOM/Gal)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Inks (Lines E-1, E-2, E-3, E-4 and E-5)	465	4164	5.94	1.38	12.37
Inks (Lines N-6, N-7 and N-8)	244	2340	5.55	0.68	6.49
Propanol Cleanup	60	450	6.71	0.20	1.50
Chip Dying	70	550	6.58	0.23	1.80
Miscellaneous Cleanup	65	525	6.75	0.22	<u>1.77</u>
				Total	23.93

2. The emissions of 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 by rule which would require the Permittee to obtain a Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.