

217/785-1705

LIFETIME OPERATING PERMIT

PERMITTEE

International Paper Company
Attn: Mr. John Janda, Jr.
139 East Fullerton Avenue
Carol Stream, Illinois 60188

Application No.: 05080042

I.D. No.: 043020AAQ

Applicant's Designation:

Date Received: November 2, 2012

Subject: Printing and Packaging

Date Issued: April 23, 2013

Expiration Date: See Condition 1

Location: 139 East Fullerton Avenue, Carol Stream, DuPage County, 60188

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a waste paper collection system controlled by a cyclone, one (1) Scrap Conveying Cyclone, one (1) corrugated board label applicator (Automatan), one (1) Martin Rotary Die Cutter (Martin DRO), One (1) United Rotary Die Cutter with flexographic printer, three (3) Flat Bed cutters (Bobst, Bobst #2, and Marumatsu), two (2) folder/gluers (Post Folder/Gluer #1 and Post Folder/Gluer #2), one (1) Roll Coater (Black Brothers), one (1) S & S Slitter, and pursuant to the above-referenced application.

This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This operating permit shall expire 180 days after the Illinois EPA sends a written request for the renewal of this permit.
- b. This permit shall terminate if it is withdrawn or is superseded by a revised permit.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

- c. Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith at a point beyond the property line of the source.
- d. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- 3a. Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after April 1, 2011 except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations which use organic materials at sources that emit a total of 6.8 kg/day (15 lbs/day) or more of VOM from cleaning operations at the source, in the absence of air pollution control equipment. For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;
- b. Pursuant to 35 Ill. Adm. Code 218.187(b), no owner or operator of a source subject to 35 Ill. Adm. Code 218.187 shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in 35 Ill. Adm. Code 218.187(b)(1), (b)(2), or (b)(3):
 - i. The VOM content of the as-used cleaning solutions does not exceed the following emissions limitations:

Cleaning of ink application equipment:

	<u>kg/l</u>	<u>lb/gal</u>
Flexographic printing that does not print flexible packaging	0.10	0.83
 - ii. The VOM composite vapor pressure of each as-used cleaning solution used does not exceed 8.0 mmHg measured at 20°C (68°F);
- c. Pursuant to 35 Ill. Adm. Code 218.204(c), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Paper Coating. The following emission limitations are expressed in

units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. (Note: The equation presented in 35 Ill. Adm. Code 218.206 shall be used to calculate emission limitations for determining compliance by add on controls, credits for transfer efficiency, emissions trades and cross line averaging.) The emission limitations are as follows:

On and after May 1, 2011:	kg VOM/kg (lb VOM/lb)	kg VOM/kg (lb VOM/lb)
	solids applied	coatings applied
i. Pressure sensitive tape and label surface coatings	0.20	(0.067)
ii. All other paper coatings	0.40	(0.08)

- d. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall only apply to photochemically reactive material.
- e. Pursuant to 35 Ill. Adm. Code 218.401(a)(2)(A), no owner or operator of a subject flexographic or rotogravure printing line shall apply at any time any coating or ink unless the VOM content does not exceed the limitation specified in either 35 Ill. Adm. Code 218.401(a)(1) or (a)(2), as applicable. Compliance with 35 Ill. Adm. Code 218.401 must be demonstrated through the applicable coating or ink analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.404(c). As an alternative to compliance with 35 Ill. Adm. Code 218.401(a), a subject printing line may meet the requirements of 35 Ill. Adm. Code 218.401(b) or (c). On and after August 1, 2010 for owners/operators of flexographic or rotogravure printing lines that do not print flexible packaging, either:
 - i. Forty percent VOM by volume of the coating and ink (minus water and any compounds which are specifically exempted from the definition of VOM); or
 - ii. Twenty-five percent VOM by volume of the volatile content in the coating and ink;

- f. Pursuant to 35 Ill. Adm. Code 218.402(d), once subject to the limitations of 35 Ill. Adm. Code 218.401, a flexographic or rotogravure printing line is always subject to the limitations of 35 Ill. Adm. Code 218.401.
- g. Pursuant to 35 Ill. Adm. Code 218.900(a), except as provided in 35 Ill. Adm. Code 218.900(b), on and after May 1, 2012, the requirements of 35 Ill. Adm. Code 218 Subpart JJ shall apply to miscellaneous industrial adhesive application operations at sources where the total actual VOM emissions from all such operations, including related cleaning activities, equal or exceed 6.8 kg/day (15 lbs/day), calculated in accordance with 35 Ill. Adm. Code 218.904(a)(1)(B), in the absence of air pollution control equipment.
- h. Pursuant to 35 Ill. Adm. Code 218.901(b)(1)(D), the owner or operator of adhesive application operations listed in 35 Ill. Adm. Code 218.901(b) shall comply with the following VOM emission limitations, minus water and any compounds that are specifically exempted from the definition of VOM, as applied. If an adhesive is used to bond dissimilar substrates together, the substrate category with the highest VOM emission limitation shall apply:

	kg VOM/l adhesive or adhesive primer applied	lb VOM/gal adhesive or adhesive primer applied
General adhesive application operations		
i. Porous material (except wood)	0.120	(1.0)
ii. Other substrates	0.250	(2.1)

- 4. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- 5a. Pursuant to 35 Ill. Adm. Code 218.187(a)(2)(A), notwithstanding 35 Ill. Adm. Code 218.187(a)(1): The following cleaning operations shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (e), (f), and (g):
 - i. Janitorial cleaning;
 - ii. Stripping of cured coatings, inks, or adhesives;

- iii. Cleaning operations in printing pre-press areas, including the cleaning of film processors, color scanners, plate processors, film cleaning, and plate cleaning;
- b. Pursuant to 35 Ill. Adm. Code 218.204(c)(3), the paper coating limitation set for in 35 Ill. Adm. Code 218.204(c) shall not apply to any owner or operator of any paper coating line on which flexographic, rotogravure, lithographic, or letterpress printing is performed if the paper coating line complies with the applicable emissions limitations in 35 Ill. Adm. Code 218 Subpart H. In addition, screen printing on paper is not regulated as paper coating, but is regulated under 35 Ill. Adm. Code 218 Subpart TT. On and after May 1, 2011, the paper coating limitation shall also not apply to coating performed on or in-line with any digital printing press, or to size presses and on-machine coaters on papermaking machines applying sizing or water-based clays.
- c. Pursuant to 35 Ill. Adm. Code 218.402(c), upon achieving compliance with 35 Ill. Adm. Code 218 Subpart H, the flexographic and rotogravure printing lines are not required to meet 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302). Flexographic and rotogravure printing lines exempt from 35 Ill. Adm. Code 218 Subpart H are subject to 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302). Rotogravure or flexographic equipment used for both roll printing and paper coating is subject to 35 Ill. Adm. Code 218 Subpart H.
- d. Pursuant to 35 Ill. Adm. Code 218.900(b)(2), the requirements of 35 Ill. Adm. Code 218.901(b) through (e) shall not apply to the following:
 - i. Aerosol adhesive and aerosol adhesive primer application operations;
 - ii. Operations using adhesives and adhesive primers that are supplied to the manufacturer in containers with a net volume of 0.47 liters (16 oz) or less, or a net weight of 0.45 kg (1 lb) or less.
- 6a. Pursuant to 35 Ill. Adm. Code 218.187(c), the owner or operator of a subject source shall demonstrate compliance with 35 Ill. Adm. Code 218.187 by using the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.187(g) and by complying with the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.187(e).
- b. Pursuant to 35 Ill. Adm. Code 218.187(d), the owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 218.187 shall comply with the following for each subject cleaning operation. Such requirements are in addition to work practices set forth in 35 Ill. Adm. Code 218.187(b)(4) and (b)(5), as applicable:
 - i. Cover open containers and properly cover and store applicators used to apply cleaning solvents;

- ii. Minimize air circulation around the cleaning operation;
 - iii. Dispose of all used cleaning solutions, cleaning towels, and applicators used to apply cleaning solvents in closed containers;
 - iv. Utilize equipment practices that minimize emissions.
- c. Pursuant to 35 Ill. Adm. Code 218.218(a), on and after May 1, 2011, every owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 218.204(c) shall:
- i. Store all VOM-containing cleaning materials in closed containers;
 - ii. Ensure that mixing and storage containers used for VOM-containing materials are kept closed at all times except when depositing or removing those materials;
 - iii. Minimize spills of VOM-containing cleaning materials;
 - iv. Convey VOM-containing cleaning materials from one location to another in closed containers or pipes; and
 - v. Minimize VOM emissions from the cleaning of storage, mixing, and conveying equipment.
- d. Pursuant to 35 Ill. Adm. Code 218.901(e), the owner or operator of a source subject to 35 Ill. Adm. Code 218 Subpart JJ shall apply all miscellaneous industrial adhesives using one or more of the following methods:
- i. Electrostatic spray;
 - ii. High volume low pressure (HVLP) spray;
 - iii. Flow coating. For the purposes of 35 Ill. Adm. Code 218 Subpart JJ, flow coating means a non-atomized technique of applying coating to a substrate with a fluid nozzle with no air supplied to the nozzle;
 - iv. Roll coating or hand application, including non-spray application methods similar to hand or mechanically powered caulking gun, brush, or direct hand application;
 - v. Dip coating, including electrodeposition. For purposes of 35 Ill. Adm. Code 218 Subpart JJ, "electrodeposition" means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created;
 - vi. Airless spray;

- vii. Air-assisted airless spray; or
 - viii. Another adhesive application method capable of achieving a transfer efficiency equal to or better than that achieved by HVLP spraying, if the method is approved in writing by the Illinois EPA.
- e. Pursuant to 35 Ill. Adm. Code 218.901(f), the owner or operator of a source subject to 35 Ill. Adm. Code Part 218 Subpart JJ shall comply with the following work practices for each subject miscellaneous adhesive application operation at the source:
- i. Store all VOM-containing adhesives, adhesive primers, process-related waste materials, cleaning materials, and used shop towels in closed containers;
 - ii. Ensure that mixing and storage containers used for VOM-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing those materials;
 - iii. Minimize spills of VOM-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials;
 - iv. Convey VOM-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials from one location to another in closed containers or pipes; and
 - v. Minimize VOM emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
7. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 8a. Emissions and operation of the corrugated board label applicator (Automatan), and Rotary Die Cutter (Martin DRO), the two folder/gluer (Post Folder/Gluer #1 and Post Folder/Gluer #2), the Flat Bed Die Cutters (Bobst, Bobst #2, Marumatsu), and Roll Coater (Black Brothers), and the United rotary die cutter with flexographic printer shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
2.25	22.5	2.25	22.5

- b. These limits are based on the maximum material usage and material balance. VOM and HAP emissions shall be calculated using the following equation:

$$E = \sum (I_i \times V_{Ii}) + \sum (FS_j \times V_{FSj}) + \sum (CS_k \times V_{CSk})$$

Where:

E = VOM or HAP emissions (tons);

I_i = Ink and coating usage (tons);

V_{Ii} = VOM or HAP content of ink or coating (weight fraction);

FS_j = Glue usage (tons);

V_{FSj} = VOM or HAP content of glue (weight fraction);

CS_k = Cleaning solution usage (tons); and

V_{CSk} = VOM or HAP content of cleaning solution (weight fraction).

- c. Emissions and operation of the scrap conveying/cyclone process, shall not exceed the following limits:

Process Weight Rate		PM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
3274	38438	2.08	24.46

These limits are based on maximum process weight rate of 8800 lbs/hour of paperboard scrap and the PM emissions are based on the allowable emission rate from 35 Ill. Adm. Code 212.321 (5.6 lbs/hour).

- d. This permit is issued based on negligible emission of particulate matter (PM) from the waste paper collection system. For this purpose, PM emission from each emission unit shall not exceed a nominal emission rate of 0.1 lb/hour and 0.44 tons/year.
- e. This permit is issued based on negligible emissions of Particulate Matter (PM) from the Bobst, Bobst #2, and Marumatsu Flatbed Die Cutters, the S & S Slitter and the Rotary Die Cutter (Martin DRO). For this purpose, PM emissions from each unit shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- f. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 9a. Pursuant to 35 Ill. Adm. Code 218.187(g)(1), testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218.187 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA, or as otherwise specified in 35 Ill. Adm. Code

218.187. 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 the testing to allow the Illinois EPA to be present during the testing;

- b. Pursuant to 35 Ill. Adm. Code 218.187(g)(2), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.187(b)(1), and to determine the VOM content of cleaning solvents and cleaning solutions, shall be conducted as follows:
 - i. The applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) shall be used, provided, however, Method 24 shall be used to demonstrate compliance; or
 - ii. The manufacturer's specifications for VOM content for cleaning solvents 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 Ill. Adm. Code 218.105(a); provided, however, Method 24 shall be used to determine compliance. In the event of any inconsistency between a Method 24 test and the manufacturer's specifications, the Method 24 test shall govern;
- c. Pursuant to 35 Ill. Adm. Code 218.187(g)(3), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
- d. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.
- e. Pursuant to 35 Ill. Adm. Code 218.404(a), the VOM content of each coating and ink and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.404.
- f. Pursuant to 35 Ill. Adm. Code 218.902(a), testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218 Subpart JJ shall be conducted by the owner or operator by May 1, 2012. Thereafter, testing shall be conducted within 90 days after a request by the Illinois EPA, or as otherwise provided in 35 Ill. Adm. Code 218 Subpart JJ. The 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 the testing to allow the Illinois EPA to be present during testing.

- g. Pursuant to 35 Ill. Adm. Code 218.902(b), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.901(b) shall be conducted as follows:
 - i. Method 24, shall be used for non-reactive adhesives. If it is demonstrated to the satisfaction of the Illinois EPA and the USEPA that plant adhesive formulation data are equivalent to Method 24 results, formulation data may be used. In the event of any inconsistency between a Method 24 test and a facility's formulation data, the Method 24 test will govern;
 - ii. Appendix A of 40 CFR 63, Subpart PPPP, shall be used for reactive adhesives.
 - iii. The manufacturer's specifications for VOM content for adhesives may be used if the specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.902(b)(1) and (b)(2), as applicable.
- 10a. Pursuant to 35 Ill. Adm. Code 218.187(e)(3), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(1) shall collect and record the following information for each cleaning solution used:
 - i. For each cleaning solution which is prepared at the source with automatic equipment:
 - A. The name and identification of each cleaning solution;
 - B. The VOM content of each cleaning solvent in the cleaning solution;
 - C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
 - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
 - E. The VOM content of the as-used cleaning solution with supporting calculations; and
 - F. A calibration log for the automatic equipment, detailing periodic checks;
 - ii. For each batch of cleaning solution which is not prepared at the source with automatic equipment:
 - A. The name and identification of each cleaning solution;

- B. Date, time of preparation, and each subsequent modification of the batch;
 - C. The VOM content of each cleaning solvent in the cleaning solution;
 - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
 - E. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are not prepared at the site but are used as purchased, the manufacturer's specifications for VOM content 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 Ill. Adm. Code 218.105(a);
- b. Pursuant to 35 Ill. Adm. Code 218.187(e)(4), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(2) shall collect and record the following information for each cleaning solution used:
- i. The name and identification of each cleaning solution;
 - ii. Date, time of preparation, and each subsequent modification of the batch;
 - iii. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
 - iv. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
 - v. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
- c. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.
- d. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:

- i. The name and identification number of each coating as applied on each coating line.
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
 - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(c)(2), the weight of VOM per weight of solids (or the weight of VOM per weight of coatings, as applicable) in each coating as applied each day on each coating line, and certified product data sheets for each coating;
- e. Pursuant to 35 Ill. Adm. Code 218.211(g)(3), on and after a date consistent with 35 Ill. Adm. Code 218.106(e), or on and after the initial startup date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 218.218 shall maintain at the source all records required by 35 Ill. Adm. Code 218.211(g) for a minimum of three years from the date the document was created and make those records available to the Illinois EPA upon request.
- f. Pursuant to 35 Ill. Adm. Code 218.404(c)(2), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(a) shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, or on and after the initial start-up date, the owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(a) shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
 - i. The name and identification number of each coating and ink as applied on each printing line.
 - ii. The VOM content of each coating and ink as applied each day on each printing line.
- g. Pursuant to 35 Ill. Adm. Code 218.904(b)(4), all sources subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart JJ shall retain all records required by 35 Ill. Adm. Code 218.904 for at least three years and make those records available to the Illinois EPA upon request.
- h. Pursuant to 35 Ill. Adm. Code 218.904(c)(2), the owner or operator of an adhesive application operation subject to the limitations of 35 Ill. Adm. Code 218.901 and complying by means of 35 Ill. Adm. Code 218.901(b) shall collect and record the name, identification number, and VOM content of each adhesive as applied each day by each adhesive application operation complying with 35 Ill. Adm. Code 218.901(b).

- 11a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Usage of inks, coatings, glues, and solvents (tons/month and tons/year);
 - ii. Natural gas usage (mmscf/month and mmscf/year);
 - iii. VOM and HAP contents of the inks, coatings, glues, and solvents used (% by weight); and
 - iv. Process weight rate for the scrap conveying/cyclone process (tons/month and tons/year);
 - v. Monthly and annual emissions of CO, NO_x, PM, SO₂, VOM and HAPs (individual and combined) from the source with supporting calculations (tons/month and tons/year).
 - b. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, 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 that may be specified in this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
 - c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three (3) 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 storage device) 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.
12. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the

Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.

- 13a. Pursuant to 35 Ill. Adm. Code 218.187(e)(2)(B), all sources subject to the requirements of 35 Ill. Adm. Code 218.187 shall: At least 30 calendar days before changing the method of compliance between 35 Ill. Adm. Code 218.187(b)(1), (b)(2), (b)(4), or (b)(5) and 35 Ill. Adm. Code 218.187(b)(3), notify the Illinois EPA in writing of such change. Such notification shall include a demonstration of compliance with the newly applicable subsection;
- b. Pursuant to 35 Ill. Adm. Code 218.187(e)(9), all sources subject to the requirements of 35 Ill. Adm. Code 218.187(b) and (d) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.187(b) or (d) by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation;
- c. Pursuant to 35 Ill. Adm. Code 218.211(c)(1), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following:
 - i. By a date consistent with 35 Ill. Adm. Code 218.106, or upon initial start-up of a new coating line, or upon changing the method of compliance from an existing subject coating line from 35 Ill. Adm. Code 218.205, 35 Ill. Adm. Code 218.207, 35 Ill. Adm. Code 218.215, or 35 Ill. Adm. Code 218.216 to 35 Ill. Adm. Code 218.204; the owner or operator of a subject coating line shall certify to the Illinois EPA that the coating line will be in compliance with 35 Ill. Adm. Code 218.204 on and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date. The certification shall include:
 - A. The name and identification number of each coating as applied on each coating line;
 - B. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
 - C. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(c)(2), the weight of VOM per weight of solids (or the weight of VOM per weight of coatings, as applicable) in each coating as applied each day on each coating line
 - ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:

- A. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - B. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1), (e)(1), or (i)(1) as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d), (e), or (i) as applicable.
- c. Pursuant to 35 Ill. Adm. Code 218.211(g), on and after a date consistent with 35 Ill. Adm. Code 218.106(e), or on and after the initial startup date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 218.218 shall comply with the following:
- i. By May 1, 2011, or upon initial startup, whichever is later, submit a certification to the Illinois EPA that includes a description of the practices and procedures that the source will follow to ensure compliance with the applicable requirements in 35 Ill. Adm. Code 218.218;
 - ii. Notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.218 by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation.
- d. Pursuant to 35 Ill. Adm. Code 218.404(c), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(a) shall comply with the following:
- i. By a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, or upon initial start-up of a new printing line, or upon changing the method of compliance from an existing subject printing line from 35 Ill. Adm. Code 218.401(b) or 35 Ill. Adm. Code 218.401(c) to 35 Ill. Adm. Code 218.401(a), the owner or operator of a subject printing line shall certify to the Illinois EPA that the printing line will be in compliance with 35 Ill. Adm. Code 218.401(a) on and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, or on and after the initial start-up date. The owner or operator of a printing line subject to the requirements in 35 Ill. Adm. Code 218.401(a)(2)(B) shall certify in accordance with 35 Ill. Adm. Code 218.404(c)(1) even

if the owner or operator of such line submitted a certification prior to January 1, 2010. Such certification shall include:

- A. The name and identification number of each coating and ink as applied on each printing line.
 - B. The VOM content of each coating and ink as applied each day on each printing line.
- ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, or 35 Ill. Adm. Code 218.403(e), as applicable, the owner or operator of a subject printing line shall notify the Illinois EPA in the following instances:
- A. Any record showing violation of 35 Ill. Adm. Code 218.401(a) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - B. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(a) to 35 Ill. Adm. Code 218.401(b) or (c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(d)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(a) to 35 Ill. Adm. Code 218.401(b) or (c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(d) or (e), respectively.
- e. Pursuant to 35 Ill. Adm. Code 218.904(b), all sources subject to the requirements of 35 Ill. Adm. Code 218 Subpart JJ shall:
- i. At least 30 calendar days before changing the method of compliance in accordance with 35 Ill. Adm. Code 218.901(b), (c), and (d), notify the Illinois EPA in writing of the change. The notification shall include a demonstration of compliance with the newly applicable subsection;
 - ii. Notify the Illinois EPA in writing of any violation of the requirements of 35 Ill. Adm. Code 218 Subpart JJ within 30 days following the occurrence of the violation and provide records documenting the violation upon request by the Illinois EPA;
- 14a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions or future occurrences.

- b. Two (2) copies of required reports and notifications shall be sent to:

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

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

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

15. Persons with lifetime operating permits must obtain a revised permit for any of the following changes at the source:
- a. An increase in emissions above the amount the emission unit or the source is permitted to emit;
 - b. A modification;
 - c. A change in operations that will result in the source's noncompliance with conditions in the existing permit; or
 - d. A change in ownership, company name, or address, so that the application or existing permit is not longer accurate.

If you have any questions on this, please call David Hulskotter at 217/785-1705.

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

Date Signed: _____

ECB:DWH:jws

cc: Illinois EPA, FOS Region 1
Lotus Notes