

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Rockford Silk Screen Process, Inc.  
Attn: Scott Nelson  
6201 Material Avenue  
Post Office Box 1975  
Rockford, Illinois 61110

Application No.: 07080050

I.D. No.: 201030AZE

Applicant's Designation:

Date Received: August 22, 2007

Subject: Screen Printing

Date Issued: March 26, 2009

Expiration Date: March 26, 2014

Location: 6201 Material Avenue, Rockford, Winnebago County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of ten (10) screen printing presses (EU1 - EU-10) and 6 UV printers (EU11 - EU16) 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., 100 tons/year for Volatile Organic Material (VOM) and 10 tons/year for a single Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such 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. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 218.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K shall apply only to photochemically reactive material.
3. Pursuant to 35 Ill. Adm. Code 215.206(a)(1), the limitations of 35 Ill. Adm. Code 215 Subpart F (Coating Operations) shall not apply to coating plants in which emissions of volatile organic material as limited by the operating permit will not exceed 22.7 Mg/year (25 tons/year), in the absence of air pollution control equipment.

- 4. In the event that the operation of this source 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.
- 5a. Emissions and operating of the ten screen printing presses shall not exceed the following limits:

<u>VOM Usage</u>		<u>VOM Emissions</u>	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Ton/Month)</u>	<u>(Tons/Year)</u>
2.1	21.0	2.1	21.0

These limits are based on the facility's maximum limited production rate and the maximum VOM content of the inks and solvents.

The above limitations were established in Permit 07080051, pursuant to 35 Ill. Adm. Code Part 203 and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203 and the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

- b. This permit is issued based on negligible emissions of volatile organic material from the 6 UV printers (EU11 - EU16). For this purpose, emissions from each emission unit shall not exceed nominal emission rates of 0.1 pound/hour and 0.44 tons/year.
- c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.99 tons/month and 19.9 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements to obtain a Clean Air Act Permit Program (CAAPP) Permit and Section 112(g) of the Clean Air Act.
- d. The VOM and HAP emissions shall be calculated using the following equations:

$$E = \sum (I \times V_I) + \sum (S_m \times V_m),$$

where:

E = VOM or HAP emissions (tons);

I<sub>i</sub> = Ink usage (tons);

V<sub>I</sub> = VOM or HAP content of ink (weight %);

S<sub>m</sub> = Solvents usage (tons); and

$V_m =$  VOM or HAP content of solvents (weight %);

- e. 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).
- 6a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
  - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
  - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 7 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 7. Pursuant to 35 Ill. Adm. Code 215.208(a), the VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. For printing inks, the volatile organic material content shall be determined by Method

24A, 40 CFR Part 60, Appendix A. 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 determined that such data demonstrated that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative.

8. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- 9a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. Monthly and annual usage of inks, coatings and solvents (tons/month, tons/year);
  - ii. VOM and HAP content of all VOM and HAP-containing materials (weight %);
  - iii. Monthly and annual VOM and HAP emissions, with supporting calculations (tons/month, tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) 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.

10a. If there is an exceedance of or 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 and 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  
5415 North University  
Peoria, Illinois 61614

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

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

Date Signed: \_\_\_\_\_

ECB:DWH:psj

cc: Illinois EPA, FOS Region 2  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from this screen printing plant 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 below the levels, (e.g., 100 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for any combination of such 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.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)		
	<u>VOM</u>	<u>Single HAP</u>	<u>Total HAPs</u>
Screen Printing Presses	21.00		
UV Printer EU11	0.44		
UV Printer EU12	0.44		
UV Printer EU13	0.44		
UV Printer EU14	0.44		
UV Printer EU15	0.44		
UV Printer EU16	<u>0.44</u>		
Totals	23.64	<u>7.9</u>	<u>19.9</u>

DWH:psj