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1.0 SOURCE IDENTIFICATION

1.1 Source

R. R. Donnelley & Sons Co.  
Midwest Division  
801 N. Union Street  
Dwight, Illinois 60420-7032  
815/584-4307

I.D. Number: 105025AAF  
Standard Industrial Classification: 2752 Lithographic Printing

1.2 Owner/Parent Company

R. R. Donnelley & Sons Co.  
77 West Wacker Drive  
Chicago, Illinois 60601-1696

1.3 Operator

R.R. Donnelley & Sons Co.  
Midwest Division  
801 N. Union Street  
Dwight, Illinois 60420-7032

Kurt B. Melocik  
815/584-4307

1.4 General Source Description

R. R. Donnelley & Sons Company is located at 801 N. Union Street in Dwight. The source is an offset lithographic printing plant. The main products are telephone directories, magazines, newspaper inserts and other printed material. Offset lithographic printing presses, boilers and paper collection system are the emission units at this source.

2.0 LIST OF ABBREVIATIONS/ACRONYMS

acfm	Actual cubic feet per minute
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC, 27717
Btu	British Thermal Unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
EPA	Environmental Protection Agency
ft <sup>3</sup>	cubic foot
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by IEPA
°F	degrees Fahrenheit
°K	degrees Kelvin
Kg	Kilogram
lb	Pound
m	meter
Mg	Megagram
mmHg	millimeters of mercury
mo	Month
NO <sub>x</sub>	Nitrogen Oxides
NSR	New Source Review
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO <sub>2</sub>	Sulfur Dioxide
T	Ton
T1	Title I - Identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New - Identifies Title I conditions that are being established in this permit.
T1R	Title I Revised - Identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit.
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOM	Volatile Organic Material
wt.	Weight
yr	Year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities at the Source

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Glue Pots  
Paster Adhesive Operations

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 202.210(a)(2) or (a)(3), as follows:

Portable Ink Jet Units  
Bulk Ink Tanks  
Air Compressor  
Wrapper Sealing System

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combustion with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

### 3.2 Addition of Insignificant Activities

- 3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted pursuant to 35 IAC 201.212(a).
- 3.2.2 The Permittee must notify the Agency of any proposed addition of a new insignificant activity of a type identified in 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to 39.5(12)(b) of the Act.
- 3.2.3 The Permittee is not required to notify the IEPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Emission Control Equipment	Date Constructed
01	Cyclone 1 with Associated Paper Collection System	None	1968
02	Cyclone 2 with Associated Paper Collection System	None	1968
03	Cyclone 3 with Associated Paper Collection System	None	1968
04	Cyclone 4 with Associated Paper Collection System	None	1986
05	Cyclone 5 with Associated Paper Collection System	None	1995
06	Pneumatic Dust Collection System	Baghouse Dust Collector	1972
902	Nonheatset Offset Lithographic Printing Line DCP-902	None	1993
903	Nonheatset Offset Lithographic Printing Line DCP-903	None	1996
910	Heatset/Nonheatset Web Offset Printing Line DMM-910	Thermal Oxidizer AB-2	1995
913	Nonheatset Offset Lithographic Printing Line DM-913	None	1992
914	Nonheatset Web Offset Lithographic Printing Line DM-914	None	2001
921	Nonheatset Offset Lithographic Printing Line DM-921	None	1980
910	Heatset/Nonheatset Web Offset Printing Line DMM-910	Thermal Oxidizer AB-2	1995
923	Heatset/Nonheatset Web Offset Printing Line DM-923	None	1980
924	Nonheatset Offset Lithographic Printing Press DM-924	None	1980
925	Heatset/Nonheatset Web Offset Printing Line DM-925	Thermal Oxidizer AB-2	1985
926	Heatset/Nonheatset Web Offset Printing Line DMT-926	Thermal Oxidizer AB-2	1983
927	Heatset/Nonheatset Web Offset Printing Line DMT-927	Thermal Oxidizer AB-2	1983
929	Heatset/Nonheatset Web Offset Printing Line DMT-929	Catalytic Afterburner AB-1	1990
931	Nonheatset Offset Lithographic Printing Line DM-931	None	1968
932	Nonheatset Offset Lithographic Printing Line DM-932	None	1968
B1	Gas Fired Boiler B1 with Emergency Standby Propane Gas Capability	None	1968
B2	Gas Fired Boiler B2 with Emergency Standby Propane Gas Capability	None	1968

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAPs.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 25 miles per hour, pursuant to 35 IAC 212.301 and 212.314.
- b. 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, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- c. No person shall cause or allow the emissions of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm pursuant to 35 IAC 214.301.

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for major vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal of appliances must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 50 CFR Part 70 or 71.

5.2.5 Should this stationary source, as defined in 40 CFR Part 63, become subject to 40 CFR Part 63, then the owner or operator shall comply with the applicable requirements of 40 CFR Part 63 by the date(s) specified in the NESHAP and shall certify compliance with the applicable requirements of 40 CFR Part 63 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.2.7 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
  - i. Illinois EPA, Compliance Section; and
  - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

- iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.7 CAM Plan

This stationary source has pollutant-specific emission units that are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceed major source threshold levels.

5.3 Non-Applicability of Regulations

- 5.3.1 This permit is issued based on the source not being subject to 40 CFR Part 63, Subpart KK National Emission Standards for Printing and Publishing, because the source does not use rotogravure or flexographic printing presses.

5.4 Source-Wide Operational and Production Limits and Work Practices

N/A

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	327.3
Sulfur Dioxide (SO <sub>2</sub> )	0.3
Particulate Matter (PM)	160
Nitrogen Oxides (NO <sub>x</sub> )	53.2
HAP, not included in VOM or Particulate Matter	3.4
Total	544.2

#### 5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

#### 5.5.3 Other Source-Wide Emission Limitations

- a. Emissions of volatile organic material from Printing Lines 921, 923, 924, 925, 926, 927, 929, 931 and 932 shall not exceed 30 tons per month and 240.4 tons per year. These limits are based on the compliance procedures specified in Condition 7.1.12
- b. 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 (running 12 months total).

The above limitations contain revisions to previously issued Permits 83050038, 85040038 and 90070035. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, emission limits have been combined and production limits on individual materials have been removed [T1R].

#### 5.6 General Recordkeeping Requirements

##### 5.6.1 Emission Records

- a. The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act.

Total annual emissions on a calendar year basis for the emission units covered by

Section 7 (Unit Specific Conditions) of this permit.

- b. The Permittee shall maintain records of the annual HAP emissions.
- c. Monthly and annual VOM emissions for the printing lines listed in Condition 5.5.3.

5.6.2 Retention and Available of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provisions herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emission Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year, including HAP emissions.

- 5.7.3 The Permittee shall report any exceedance of the emission limits of Condition 5.5.3 within 30 days.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

- a. The Permittee is authorized to make the following physical or operational changes without applying for or obtaining a new permit or amendment to this permit, provided that the emissions from the unit or group of units will not exceed the applicable regulations or operational limitations of this permit:

- i. Upgrades of system fans, ductwork, balers and electrical components and/or logical sequence of operation.
  - ii. Installation and operation of automated cleaning solvent application devices.
  - iii. Use of Ultra-violet (UV) or water based coatings.
  - iv. Use of vegetable oil based inks.
  - v. Use of low-VOM solvents.
  - vi. Use of either 2-part (Alcohol Substitute + Etch) or 1-part fountain solutions on all presses.
  - vii. Use of waterless printing process.
  - viii. Use of propane/air mixture equivalent to the combustion characteristics of natural gas, in the press dryers, boilers and afterburners.
  - ix. Operation of controlled presses without the pollution control equipment, if such operation will not result in emissions above the allowable emissions limitations set forth in this permit.
- b. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any construction of a new emission unit.

5.9 General Compliance Procedures for Calculating Emissions.

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of this permit, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Units 910, 922, 923, 925, 926, 927 and 929 heatset web offset printing lines.

7.1.1 Description

Heatset web offset lithographic printing presses are being used for printing of magazines, newspaper inserts and other printed material. These printing presses can be used in the heatset mode of operation or the nonheatset mode of operation.

Press 923 is uncontrolled but is using nonphotochemically reactive materials. The other heatset web offset printing presses are controlled by a thermal oxidizer or a catalytic afterburner. The Permittee is allowed to shut off the thermal oxidizer and catalytic afterburner when the presses are operating at low process weight rates if no applicable requirements or permit conditions are violated.

7.1.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
910	Heatset/Nonheatset Web Offset Printing Line DMM-910	Thermal Oxidizer AB-2
923	Heatset/Nonheatset Web Offset Printing Line DM-923	None
925	Heatset/Nonheatset Web Offset Printing Line DM-925	Thermal Oxidizer AB-2
926	Heatset/Nonheatset Web Offset Printing Line DMT-926	Thermal Oxidizer AB-2
927	Heatset/Nonheatset Web Offset Printing Line DMT-927	Thermal Oxidizer AB-2
929	Heatset/Nonheatset Web Offset Printing Line DMT-929	Catalytic Afterburner AB-1

7.1.3 Applicable Regulations

- a. The printing lines are subject to the emission limits identified in Condition 5.2.2.
- b. The Permittee may not cause or allow the operation of any heatset web offset press unless the fountain solution contains no more than eight (8) percent, by weight, of VOM [35 IAC 215.408(b)].

7.1.4 Non-Applicability of Regulations

- a. The 8 pounds per hour organic material emission limitation of 35 IAC 215.301 does not apply to the

printing lines listed in Condition 7.1.2 because 35 IAC 215.403 exempts printing presses in compliance with 35 IAC 215 Subpart P: Printing and Publishing.

- b. 35 IAC 215.204(c) Paper Coating, does not apply to the printing lines listed in Condition 7.1.2 because, 35 IAC 215.204(c) exempts equipment from complying with this regulation when both printing and coating are performed on the same emission unit.

#### 7.1.5 Operational Limitations and Work Practices

- a.
  - i. Operation of thermal oxidizer AB-2 shall be operated to reduce VOM emissions from heatset printing by a minimum of 90% by weight.
  - ii. The thermal oxidizer shall be preheated to 1400°F prior to the introduction of any VOM emissions, and it shall be maintained at 1400°F whenever VOM emissions are being introduced. If the thermal oxidizer drops below 1400°F, it shall be assumed that VOM emissions are not being destroyed.
- b. The catalytic afterburner shall be operated to provide at least 90% destruction efficiency of VOM for press DMT-929
- c. Each printing line shall be operated with natural gas or propane gas as the only fuels burned in the press dryers and afterburners.
- d. Notwithstanding Conditions 7.1.5(a) and (b) the Permittee is allowed to operate heatset web offset printing presses without afterburner control if the emissions from the individual presses meet the requirements of Condition 7.1.3(a) and no other permit emission limitations or requirements will be violated.

#### 7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source-wide emission limitations in Condition 5.5, the printing lines are subject to the following:

- a. Emissions of volatile organic material from printing line DMM-910 shall not exceed 5.0 tons per month and 39.6 tons per year. These limits are based on the compliance procedures specified in Condition 7.1.12.
- b. 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 (running 12 months total).

The above limitations contain revisions to previously issued Permit 95060173. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, production limits on individual materials have been removed and annual VOM emissions have been increased by 1.2 tons [T1R].

#### 7.1.7 Testing Requirements

- a. Emission testing pursuant to 35 IAC 215.410.
  - i. Any required tests of volatile organic material emissions, including tests conducted to determine control equipment efficiency or control device destruction efficiency, shall be conducted in accordance with the methods and procedures specified in Section 215.102.
  - ii. Upon a reasonable request by the Agency, the owner or operator of a volatile organic material emission source required to comply with the limits of this Subpart shall conduct emissions testing, at his own expense, to demonstrate compliance.
  - iii. A person planning to conduct a volatile organic material emissions test to demonstrate compliance with this permit shall notify the Agency of that intent not less than 30 days before the planned initiation of the tests so the Agency may observe the test.

b. Testing methods for volatile organic material content

Upon request by the Illinois EPA, the volatile organic material content of printing inks, blanket wash, fountain solution and coatings shall be determined by Method 24, 40 CFR 60, Appendix A, incorporated by reference in Section 215.105 [35 IAC 215.409].

7.1.8 Monitoring Requirements

- a. The thermal oxidizer shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the thermal oxidizer combustion chamber temperature.
- b. The catalytic afterburner shall be equipped with continuous temperature indicators and either strip chart recorders or computer disk storage for the pre and post-catalyst bed temperatures in order that the temperature rise across the bed may be calculated.

7.1.9 Recordkeeping Requirements

The Permittee shall collect and record the following information for the offset printing lines:

- a. Thermal oxidizer and catalytic afterburner monitoring data.
- b. A record of operating time for thermal oxidizer and catalytic afterburner.
- c. A record of operating time for the printing lines indicating operating time and whether the VOM emissions were controlled by the thermal oxidizer, catalytic afterburner or uncontrolled. If a printing press was operating uncontrolled include the reason for it operating uncontrolled.
- d. Usage of ink, fountain solution, coating and blanket wash for the heatset/nonheatset web offset printing lines in tons per month.
- e. The VOM content (VOM weight %) of the ink, fountain solution, coating and blanket wash used with basis, accompanied by a copy of the supporting information, e.g., supplier data sheet or laboratory analysis report.
- f. VOM emissions per month in tons calculated in accordance with condition 7.1.12.

#### 7.1.10 Reporting Requirements

##### a. Report of Deviations

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 Agency'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 [Section 39.5(7)(f)(ii) of the Act].

b. The Permittee shall report any usage of fountain solution that contains more than 8 percent, by weight of VOM.

c. The Permittee shall report any exceedance of the emission limits of Condition 7.1.6 within 30 days.

#### 7.1.11 Operational Flexibility

See Condition 5.8

#### 7.1.12 Compliance Procedures

a. Compliance with emission limits shall be determined using the emission factors and formulas listed below:

Ink VOM Emissions ( $E_I$ ):

$$E_I = C_I(1-R_I)[1-(K)(J_I)]$$

Fountain Solution VOM Emissions ( $E_F$ ):

$$E_F = C_F[1-(K)(J_F)]$$

Automatic Blanket Wash VOM Emissions ( $E_A$ ):

$$E_A = C_A[1-(K)(J_A)]$$

Manual Blanket Wash VOM Emissions ( $E_M$ )

$$E_M = C_M(1-R_M)$$

Total VOM Emissions ( $E_T$ ):

$$E_T = E_I + E_F + E_A + E_M$$

Where:

$C_I$  = Ink VOM consumption (tons)

- $C_F$  = Fountain solution VOM consumption (tons)  
 $C_A$  = Automatic blanket wash VOM consumption (tons)  
 $C_M$  = Manual blanket wash VOM consumption (tons)  
 $R_M$  = Retention factor for manual blanket wash  
 = 50%, for manual blanket wash with a VOM composite partial vapor pressure less than 10 mmHg at 20°C and the used cleaning towels are kept in closed containers.  
 = 0% for other manual blanket wash  
 $R_I$  = Percent of ink VOM retained in printed product (non-heatset = 95%, heatset = 20%)  
 $K$  = Control efficiency of afterburner (non-heatset = 0%, heatset = 90% when afterburner is operating)  
 $J_I$  = Capture efficiency of dryer and control system for ink VOM (non-heatset = 0%, heatset = 100%)  
 $J_F$  = Capture efficiency of dryer and control system for fountain solution (non-heatset = 0%, heatset = 70%)  
 $J_A$  = Capture efficiency of dryer and control system for automatic blanket wash VOM (non-heatset = 0%, heatset = 40% when a blanket wash with a vapor pressure less than 10 mmHg at 20°C is used, otherwise capture efficiency = 0%)

b. Fuel combustion emissions shall be calculated based on the following:

<u>Pollutant</u>	Natural Gas Emission Factors for Boilers (lb/10 <sup>6</sup> ft <sup>3</sup> )
NO <sub>x</sub>	100
PM	7.6
SO <sub>2</sub>	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion, Table 1.4-1, and 1.4-2, AP-42, Volume I, Supplement F, March, 1998.

Emissions (lb) = (Natural Gas Consumed, ft<sup>3</sup>) x (The Appropriate Emission Factor)

7.2 Units 902, 903, 913, 914, 921, 924, 931 and 932 nonheatset offset lithographic printing lines

7.2.1 Description

Non-heatset offset lithographic printing presses are being used to print telephone directories, covers and other material. Printing presses DCP 902 and DCP 903 are sheet-fed offset presses while the other printing presses listed in Condition 7.2 are web offset presses.

7.2.2 List of Emission Equipment and Pollution Control Equipment

Emission Units	Description	Emission Control Equipment
902, 903, 913, 914, 921, 924, 931 and 932	8 Nonheatset Offset Lithographic Printing Lines	None

7.2.3 Applicable Regulations

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. If no odor nuisance exists this limitation shall apply only to photochemically reactive material [35 IAC 215.301].

7.2.4 Non-Applicability of Regulations

- a. 35 IAC 215.204 does not apply to in-line coating operations performed on the printing lines listed in Condition 7.2.2 because the coating process takes place on equipment used both for printing and coating pursuant to 35 IAC 215.204.

7.2.5 Operational and Work Practices

N/A

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source-wide emission limitations in Condition 5.5, the printing lines are subject to the following:

- a. Emissions of volatile organic material from the printing line DM-914 shall not exceed 3.0 tons per month and 24.1 tons per year. These limits are based on the compliance procedures specified in Condition 7.1.12.
- b. This permit is issued based on the nonheatset offset lithographic printing lines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

for Major Stationary Sources, because the nonheatset offset lithographic printing lines do not use add-on control devices to achieve compliance with an emission limitation or standard.

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 (running 12 month total).

The above limitations were established in Permit 01010066, pursuant to 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 CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

- b. Emissions of VOM from the following printing lines shall not exceed the following limits:

<u>Printing Line</u> (ton/year)	<u>VOM Emissions</u> (ton/month)	
DCP-902	2.3	18.2
DCP-903	2.1	16.8
DM-913	3.2	25.2

These limits are based on the compliance procedures specified in Condition 7.1.12. 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 (running 12 month total).

The above limitations contain revisions to previously issued Permits 92090010 and 96050008. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and

activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, production limits on individual materials have been removed [T1R].

7.2.7 Testing Requirements

Testing methods for volatile organic material content.

Upon request by the Illinois EPA, the volatile organic material content of printing inks, fountain solution and coatings shall be determined by Method 24, 40 CFR 60, Appendix A, incorporated by reference in Section 215.105 [35 IAC 215.409].

7.2.8 Monitoring Requirements

N/A

7.2.9 Recordkeeping Requirements

- a. The Permittee shall collect and record the following information for the non-heatset offset printing lines:
  - i. Usage of ink, fountain solution, coating and blanket wash for the non-heatset web offset printing lines in tons/month.
  - ii. The VOM content (VOM weight %) of the ink, fountain solution and cleaning solution used with basis, accompanied by a copy of the supporting information, e.g., supplier data sheet or laboratory analysis report.
  - iii. VOM emissions per month in pounds or tons calculated in accordance with Condition 7.1.12.

7.2.10 Reporting Requirements

- a. Report of Deviations

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 Agency'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 [Section 39.5(7)(f)(ii) of the Act].

- b. The Permittee shall report any exceedance of the emission limits of Condition 7.2.6 within 30 days.

7.2.11 Operational Flexibility

See Condition 5.8

7.2.12 Compliance Procedures

See Condition 7.1.12

7.3 Units 1-6 Paper Collection Systems

7.3.1 Description

Collection systems for handling of bindery and press trim and whole section paper from various locations throughout the facility. The cyclones are considered to be an integral part of the paper collection systems. Emission units 01-03 were installed prior to April 14, 1972 and are therefore subject to the existing source particulate emission standards. Emission units 04-06 were installed after April 14, 1972 and are therefore subject to the new source particulate emission standards.

The pneumatic dust collection system collects paper dust at the point of origination on the book binding lines. Then it transports the dust to the baghouse.

7.3.2 List of Emission Equipment

Emission Units	Description	Emission Control Equipment
01-05	5 Cyclones with Associated Paper Collection Systems	None
06	Pneumatic Dust Collection System	Baghouse Dust Collector

7.3.3 Applicable Regulations

- a. The paper collection systems are subject to the emission limits identified in Condition 5.2.2.
- b. i. The Permittee shall not cause or allow the emission of particulate matter into the atmosphere in any one hour period from emission units 01, 02 and 03 either alone or in combination to exceed the following allowable emission rates [35 IAC 212.322]:

Metric Process Weight ( <u>Mg/hr</u> )	Allowable Particulate Matter Emission ( <u>Kg/hr</u> )	English Process Weight ( <u>T/hr</u> )	Allowable Particulate Matter Emission ( <u>lbs/hr</u> )
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38

<u>Metric Process Weight (Mg/hr)</u>	<u>Allowable Particulate Matter Emission (Kg/hr)</u>	<u>English Process Weight (T/hr)</u>	<u>Allowable Particulate Matter Emission (lbs/hr)</u>
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.	8.7	10.00	19.20
13.	11.1	15.00	25.20
18.	13.8	20.00	30.50
23.	16.2	25.00	35.40
27.	18.15	30.00	40.00
32.	18.8	35.00	41.3

ii. Interpolated and extrapolated values of the data shall be determined by using the equation:

$$E = C + A(P)^B$$

Where:

P = Process weight rate; and  
E = Allowable emission rate; and,

Up to process weight rates of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0.00	0.00

c. i. The Permittee shall not cause or allow the emission of particulate matter into the atmosphere in any one hour period from emission units 04, 05 and 06 either alone or in combination to exceed the following allowable emission rates [35 IAC 212.321]:

<u>Metric Process Weight (Mg/hr)</u>	<u>Allowable Particulate Matter Emission (Kg/hr)</u>	<u>English Process Weight (T/hr)</u>	<u>Allowable Particulate Matter Emission (lbs/hr)</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77

Metric Process Weight (Mg/hr)	Allowable Particulate Matter Emission (Kg/hr)	English Process Weight (T/hr)	Allowable Particulate Matter Emission (lbs/hr)
0.2	0.42	0.20	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.	3.9	10.00	8.70
13.	4.8	15.00	10.80
18.	5.7	20.00	12.50
23.	6.5	25.00	14.00
27.	7.1	30.00	15.60
32.	7.7	35.00	17.00

ii. Interpolated and extrapolated values of the data shall be determined by using the equation:

$$E = A(P)^B$$

Where:

P = Process weight rate; and  
E = Allowable emission rate; and,

Up to process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

#### 7.3.4 Non-Applicability of Regulations

N/A

#### 7.3.5 Operational and Work Practices

The Permittee shall follow good operating practices for the cyclones and baghouse including periodic inspection, routine maintenance, repair of defects and visual emission checks.

7.3.6 Emission Limitations

N/A

7.3.7 Testing Requirements

N/A

7.3.8 Monitoring Requirements

N/A

7.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the paper and dust collection systems:

- a. Operating records of material throughput on a monthly basis.
- b. Weight of collected paper in pounds or tons on a monthly basis.

7.3.10 Reporting Requirements

Report of Deviations

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 [Section 39.5(7)(f)(ii) of the Act].

7.3.11 Operational Flexibility

See Condition 5.8

7.3.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in Condition 7.3.3 are assured and achieved by the performance of the operational and work practices of Condition 7.3.5.
- b. Particulate matter emission may be determined using the allowable emission values from 35 IAC 212.321 and 35 IAC 212.322.

7.4 Units B1 and B2 Gas Fired Boilers with Emergency Standby Propane Gas Capability

7.4.1 Description

Steam is produced by the boilers. The capacity of each boiler is 25 million Btu per hour.

7.4.2 List of Emission Equipment and Pollution Control Equipment

Emission Units	Description	Emission Control Equipment
B1 and B2	2 Gas Fired Boilers (B1 and B2 with Emergency Standby Propane Gas Capability	None

7.4.3 Applicable Regulations

- a. Boilers B1 and B2 are subject to the emission limits identified in Condition 5.2.2.
- b. No person shall cause or allow the emission of carbon monoxide into the atmosphere from boilers B1 and B2 to exceed 200 ppm, corrected to 50 percent excess air [35 Ill. Adm. Code 216.121].

7.4.4 Non-Applicability of Regulations

- a. The fuel combustion nitrogen oxides emission limitations of 35 IAC 217.121 and 217.141 do not apply because the capacity of the boilers is smaller than the applicability level of the regulations.
- b. 40 CFR Subpart Dc Standards of Performance for Small Steam Generating Units does not apply because the 2 boilers began operating in 1968 which is before the applicability date of Subpart Dc.

7.4.5 Operational and Work Practices

Natural gas and propane gas shall be the only fuels used in boilers B1 and B2.

7.4.6 Emission Limitations

N/A

7.4.7 Testing Requirements

N/A

7.4.8 Monitoring Requirements

N/A

7.4.9 Recordkeeping Requirements

The Permittee shall collect and record the following for boilers B1 and B2:

- a. Annual natural gas usage in cubic feet.
- b. Annual propane gas usage in cubic feet.
- c. Annual fuel combustion emissions.

7.4.10 Reporting Requirements

Report of Deviations

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 Agency'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 [Section 39.5(7)(f)(ii) of the Act].

7.4.11 Operational Flexibility

See Condition 5.8

7.4.12 Compliance Procedures

- a. Compliance with Condition 7.5.3(b) is assumed to be achieved by work practices inherent in operation of a natural gas-fired boiler, thus no compliance procedures are set in this permit addressing this regulation.
- b. To determine compliance with Condition 5.5.1 emissions from the affected boilers shall be based on the emission factors listed below:

<u>Pollutant</u>	<u>Natural Gas Emission Factors for Boilers (lb/10<sup>6</sup> ft<sup>3</sup>)</u>
NO <sub>x</sub>	100
PM	7.6
SO <sub>2</sub>	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in boilers, Tables 1.4-1, and 1.4-2, AP-42, Volume I, Supplement F, March, 1998.

Boiler Emissions (lb) = (Natural Gas Consumed, ft<sup>3</sup>)  
x (The Appropriate Emission Factor)

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after **December 21, 2002** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this

permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

#### 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

### 8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
  - i. Illinois EPA - Air Compliance Section  
  
Illinois Environmental Protection Agency  
Bureau of Air  
Compliance Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276
  - ii. Illinois EPA - Air Regional Field Office  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

#### 9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

#### 9.5 Liability

##### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

##### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

##### 9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

##### 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

#### 9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

### 9.6 Recordkeeping

#### 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

#### 9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

#### 9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

### 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

### 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more

frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

##### 9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
  - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
  - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

#### 9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

##### 9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

#### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

#### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

#### 9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTCHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

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

## 10.2 Attachment 2 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
  - Corrects typographical errors;
  - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - Requires more frequent monitoring or reporting by the Permittee;
  - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
  - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification
  - Do not violate any applicable requirement;
  - Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

### 3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency  
Division Of Air Pollution Control -- Permit Section  
P.O. Box 19506  
Springfield, Illinois 62794-9506

<b>Application For Construction Permit (For CAAPP Sources Only)</b>	<b>For Illinois EPA use only</b>
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

<b>Source Information</b>		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

<b>Owner Information</b>		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

<b>Operator Information (if different from owner)</b>		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

<b>Applicant Information</b>	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

### Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

### Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30.	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:  BY: _____ <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;">                     _____                      AUTHORIZED SIGNATURE                 </div> <div style="text-align: center;">                     _____                      TITLE OF SIGNATORY                 </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;">                     _____                      TYPED OR PRINTED NAME OF SIGNATORY                 </div> <div style="text-align: center;">                     _____ / _____ / _____                      DATE                 </div> </div>

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.