

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Marconi Data Systems, Inc.
Attn: Peter Papantos
1855 Estes Avenue
Elk Grove Village, Illinois 60007

<u>Application No.:</u> 89080007	<u>I.D. No.:</u> 031440AIW
<u>Applicant's Designation:</u>	<u>Date Received:</u> April 3, 2000
<u>Subject:</u> Ink Manufacturing	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 1855 Estes Avenue, Elk Grove Village	

This Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of 13 industrial ink mixing kettles, 4 food grade ink mixing kettles, and 2 underground storage tanks (T-1 and T-2) 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 volatile organic material and hazardous air pollutants from the source to less than major source thresholds, as further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) issued for this location.
- 2a. Operation of all ink manufacturing shall not exceed the following limits:
 - i. Food Grade Ink and Solvent Production: 20,000 lb/month and 240,000 lb/year
 - ii. Industrial Grade Ink and Solvent Production: 589,167 lb/month and 7,070,000 lb/year
 - iii. Operating Hours: 500 hr/month and 5150 hr/year

- b. These limits define the potential emissions of the ink manufacture operation and are based on the actual emissions determined from maximum production capacity and stack test data performed in February 1994 by Mostardi-Platt Associates, Inc.
- c. 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.
- 3a. Within 90 days of a written request from the Illinois EPA, pursuant to 35 Ill Adm. Code Section 201.282, the emissions of the food grade and/or industrial ink exhausts shall be measured by an approved testing service, during conditions which are representative of the maximum performance. The Illinois EPA may provide additional time for the performance of this testing upon request from the Permittee which shows that it is not feasible to perform representative testing within 90 days.
- b. i. The following methods and procedures shall be used for testing of emissions. Refer to 40 CFR 60, Appendix A for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Volatile Organic Material	USEPA Method 25 or 25A
- ii. A test shall consist of three separate runs each at least 60 minutes in duration. Compliance shall be determined from the average of the runs provided that the Illinois EPA may accept the arithmetic mean of the two runs in circumstances described in 40 CFR 60.8(f).
- c. Testing shall be performed by a qualified independent testing service.
- d. At least 30 days prior to the actual date of testing a written test plan shall be submitted to the Illinois EPA for review and approval. A copy shall also be submitted to the USEPA. This plan shall describe the specific procedures for testing, including:
 - i. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - ii. The conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum operating rate, the levels of operating parameters at or within which compliance is intended to be shown, if applicable, and the means by which the operating parameters for the process and any control equipment will be determined.

- e. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification for the expected date of testing shall be submitted a minimum of thirty (30) days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of five (5) working days prior to the actual date of the tests. The Illinois EPA may, at its discretion, accept notification with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe the testing.
4. The Permittee shall maintain records of the following items:
 - i. Food Grade Ink Production (lb/month and lb/year)
 - ii. Food Grade Solvent Production (lb/month and lb/year)
 - iii. Industrial Ink Production (lb/month and lb/year)
 - iv. Industrial Solvent Production (lb/month and lb/year)
 - v. Emissions of volatile organic material from each process listed above (4i. - 4iv.) (lb/month and lb/year)
 - vi. Hazardous Air Pollutant (HAP) emissions from each process listed above (4i. - 4iv.) by specific HAP (lb/month and lb/year)
 - vii. Operating Hours of each Kettle (hr/month and hr/year)
 - viii. Chemical type and throughput for each storage tank, T-1 and T-2, (gallons/month and gallons/year)
 5. All records and logs required by this permit shall be retained at a readily accessible location at the plant for at least 3 years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
 6. If there is an exceedance of the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance and System Management Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the record keeping requirements, a copy of the

relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences. This report should be sent to:

Illinois Environmental Protection Agency
Bureau of Air
Compliance and Systems Management Section
P.O. Box 19506
Springfield, Illinois 62794-9506

7. For purposes of fees pursuant to Section 9.6 of the Illinois Environmental Protection Act, annual emissions of specified air contaminants, i.e., particulate matter, nitrogen oxide, carbon monoxide, volatile organic material, and sulfur dioxide, shall not exceed 25 tons, which shall be the permitted emissions of this site.
- 8a. The Final Report(s) for all tests shall be submitted within 180 days after the date of the test. The Final Report shall include as a minimum:
 - i. General information describing the test, including the name and identification of the emission source which was tested, date of test, names of personnel performing the tests, and Illinois EPA observers, if any;
 - ii. A summary of results;
 - iii. Description of test procedures, including description of sampling points, test equipment, and test schedule;
 - iv. Detailed description of test conditions, including:
 - A. Process information, i.e., process rate, aggregate type, fuel type, and firing rate.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
- b. Submittals of information shall be made as follows:
 - i. Notices of Test - one copy to Source Emission Test Specialist and one copy to the Regional Office.
 - ii. Final Report - one copy to Source Emission Test Specialist, one copy to the Regional Office, and one copy to Permit Section.

Illinois Environmental Protection Agency
Division of Air Pollution Control - Regional Office
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

Illinois Environmental Protection Agency
Attn: Source Emission Test Specialist
Division of Air Pollution Control
The Eisenhower Tower
1701 First Avenue
Maywood, Illinois 60153

9. 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 nuisance.
10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: food grade ink production, food grade solvent production, industrial ink production, industrial solvent production and operating hours of kettle from the prior calendar year.

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

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

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cc: IEPA, FOS Region 1
IEPA, FOS - CMU
USEPA

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the ink manufacturing 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 well below the levels, i.e., 25 tons per year of VOM at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

1. Emissions from the ink manufacture:

<u>Process</u>	<u>Operating Hours (Hrs/Yr)</u>	<u>E M I S S I O N S</u>	
		<u>Volatile Organic Material (Lb/Hr)</u>	<u>(Tons/Yr)</u>
Food Grade Inks & Solvents	5,150	0.66	1.72
Industrial Inks & Solvents	5,150	8.59	22.16
Storage Tank T-1	---	0.10	0.40
Storage Tank T-2	---	0.10	0.40

This table defines the potential emissions of the ink manufacture and is based on the actual emissions determined from maximum production, and stack test data performed in February 1994 by Mostardi-Platt Associates, Inc.

2. As a consequence of the requirements of this permit, the emissions of hazardous air pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from this source will be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs so that HAP emissions do not trigger the requirements to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

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