

217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Printpack, Inc.
Attn: Doug Cook
4335 Wendell Drive, S.W.
Atlanta, Georgia 30336-1600

<u>Application No.:</u> 95090157	<u>I.D. No.:</u> 089438ADW
<u>Applicant's Designation:</u>	<u>Date Received:</u> September 13, 1995
<u>Operation of:</u> Printing of Flexible Packaging Material	
<u>Date Issued:</u> August 24, 1999	<u>Expiration Date</u> ² : August 24, 2004
<u>Source Location:</u> 1400 Abbott Drive, Elgin, Kane County	
<u>Responsible Official:</u> Doug Cook	

This permit is hereby granted to the above-designated Permittee to operate a printing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: November 30, 2001
Revision Date Issued: December 12, 2002
Purpose of Revision: Minor Modification

This minor modification converts the contingent allotment of ATUs in Section 6.8(b) of the original August 24, 1999 permit into actual ATUs as reflected in the revised value of ATUs in Section 6.8(a)(i) of this permit. One unit, PO8, that had a contingent allotment of ATUs, was not constructed, and is no longer eligible for ATUs in the future.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous version of the permit is incorporated herein by reference.

Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

If you have any questions concerning this permit, please contact Dan Punzak at 217/782-2113.

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

DES:DGP:jar

cc: Illinois EPA, FOS, Region 1
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

² Except as provided in Condition 8.7 of this permit.

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	7
3.1 Identification of Insignificant Activities	
3.2 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	9
5.0 OVERALL SOURCE CONDITIONS	10
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
5.10 Special Permit Shield	
6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)	18
6.1 Description of ERMS	
6.2 Applicability	
6.3 Obligation to Hold Allotment Trading Units (ATUs)	
6.4 Market Transaction	
6.5 Emission Excursion Compensation	
6.6 Quantification of Seasonal VOM Emissions	
6.7 Annual Account Reporting	
6.8 Allotment of ATUs to the Source	
6.9 Recordkeeping for ERMS	
6.10 Federal Enforceability	
6.11 Exclusions from Further Reductions	
7.0 UNIT SPECIFIC CONDITIONS	24
7.1 Unit Kidder: Flexographic Printing Presses Control: Catalytic Afterburners	

7.2	Unit: Laminators Control: Compliant Coatings or Vented to Afterburners	
7.3	Unit: Presses and Washer Within Total Enclosure Control: Catalytic Afterburners	
7.4	Unit: Manual Parts Washer	
7.5	Unit: Rotogravure Presses Control: Thermal Oxidizer	
8.0	GENERAL PERMIT CONDITIONS	47
8.1	Permit Shield	
8.2	Applicability of Title IV Requirements	
8.3	Emissions Trading Programs	
8.4	Operational Flexibility/Anticipated Operating Scenarios	
8.5	Testing Procedures	
8.6	Reporting Requirements	
8.7	Obligation To Comply With Title I Requirements	
9.0	STANDARD PERMIT CONDITIONS	51
9.1	Effect of Permit	
9.2	General Obligations of Permittee	
9.3	Obligation to Allow Illinois EPA Surveillance	
9.4	Obligation to Comply with Other Requirements	
9.5	Liability	
9.6	Recordkeeping	
9.7	Annual Emissions Report	
9.8	Requirements for Compliance Certification	
9.9	Certification	
9.10	Defense to Enforcement Actions	
9.11	Permanent Shutdown	
9.12	Reopening And Reissuing Permit For Cause	
9.13	Severability Clause	
9.14	Permit Expiration and Renewal	
10.0	ATTACHMENTS	
10.1	Attachment 1 - Requirement for Cold Cleaning Degreasers: 35 IAC 218.182	1-1
10.2	Attachment 2 - Example Certification by a Responsible Official	2-1

1.0 SOURCE IDENTIFICATION

1.1 Source

Printpack, Inc.
1400 Abbott Drive
Elgin, Illinois 60123

I.D. No.: 089438ADW
Standard Industrial Classification: 2671, Commercial Printing

1.2 Owner/Parent Company

Printpack, Inc.
4335 Wendell Drive, S.W.
Atlanta, Georgia 30336-1600

1.3 Operator

Printpack, Inc.
1400 Abbott Drive
Elgin, Illinois 60123

Jim Davies, Plant Manager
847/888-7150

1.4 General Source Description

Printpack is located at 1400 Abbott Drive in Elgin, Kane County. The source performs printing on flexible packaging materials primarily on rotogravure and flexographic presses. There are three emission control systems: two catalytic afterburners and one regenerative thermal oxidizer. Preparation of the final product may also involve extrusion and lamination. The lamination (joining together of two materials) process may involve a hot melt thermoplastic or an adhesive.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT [REVISE ACCORDINGLY]

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATUs	Allotment Trading Units
BAT	Best Available Technology
Btu	British thermal unit
°C	degrees Centigrade
CA(s)	Catalytic Afterburner(s)
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CE	Capture Efficiency
CFR	Code of Federal Regulations
cm	centimeter
DE	Destruction Efficiency
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
ft ³	cubic feet
gal	gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
in	inch
kg	kilogram
kPa	kilopascals
kW	kilowatts
lb	pound
MACT	Maximum Available Control Technology
mmBtu	Million British thermal units
mmHg	millimeters of mercury
mo	month
NO _x	Nitrogen Oxides
NESHAP	National Environmental Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	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
psi	pounds per square inch
psia	pounds per square inch absolute
PTE	Permanent Total Enclosure

RTO	Regenerative Thermal Oxidizer
SO ₂	Sulfur Dioxide
T1	Title I - Identifies Title I conditions that have been carried over from an existing construction 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
T1N	Title I New - Identifies Title I conditions that are being established in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
wt.	weight
wt. %	weight percent
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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:

Two Corona Treaters on L-31

Two Corona Treaters on L-32

Two Corona Treaters on L-33

One Corona Treater on each of Cerutti and Schiavi Rotogravure Presses (PO2 and PO6)

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Trim cyclone

Printing plate making

- 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:

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 combination 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)].

Equipment used for the mixing and blending of materials at ambient temperature to make water based adhesives, provided each material mixed or blended contains less than 5% organic solvent by weight [35 IAC 201.210(a)(9)].

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 the 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)].

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 Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.2.3 The Permittee is not required to notify the Illinois EPA 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	Date Constructed	Emission Control Equipment
P03	Kidder Flexographic Printing Press	Pre-1982	Either or Both Catalytic Afterburners (I01 or I02)
P04	Kidder Flexographic Printing Press	Pre-1982	Either or Both Catalytic Afterburners (I01 or I02)
L31	Mecca Adhesive Laminator	Pre-1972	Either or Both Catalytic Afterburners (I01 or I02)
L32	Black-Clawson Extrusion Laminator	1965	None
L33/34	Egan Tandem Extrusion Laminator	1987	None
PW01	Manual Parts Washer	Prior to 1977	None
P02	Cerutti Rotogravure Printing Press	1990	Total Enclosure Vented to Either or Both Catalytic Afterburners (I01 or I02)
P05	W & H Flexographic Printing Press	1990	Total Enclosure Vented to Either or Both Catalytic Afterburners (I01 or I02)
P06	Schiavi Rotogravure Printing Press	1994	Total Enclosure Vented to Either or Both Catalytic Afterburners (I01 or I02) or Regenerative Thermal Oxidizer (I03)
PW02	Automatic Parts Washer	1990	Total Enclosure Vented to Either or Both Catalytic Afterburners (I01 or I02) or Regenerative Thermal Oxidizer (I03)
P07	Cerutti Rotogravure Printing Press	1997	Total Enclosure Vented to Regenerative Thermal Oxidizer (I03)
P08	Schiavi Rotogravure Printing Press	1997	Total Enclosure Vented to Regenerative Thermal Oxidizer (I03)
P09	Flexographic Printing Press	1999	Total Enclosure Vented to Regenerative Thermal Oxidizer (I03)
PW03	Parts Washer	1997	Total Enclosure Vented to Regenerative Thermal Oxidizer (I03)
TR1-4	Corona Film Treaters	1997	Ozone Destruction System on Individual Units

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 emissions.
- 5.1.2 This permit is issued based on the source not being a major source of 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 emission 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 40.2 kilometers per hour (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 other than those emission units subject to the requirements of 35 IAC 212.122, 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 emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [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 motor vehicle air conditioners in Subpart B of 40 CFR Part 82:
 - a. Persons opening appliances for maintenance, service, repair, or disposal 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.

5.3 Non-Applicability of Regulations of Concern

5.3.1 Non-Applicability of NSPS:

- a. This permit is issued based upon the rotogravure presses constructed after October 28, 1980 not being subject to 40 CFR 60 Subpart QQ because the rotogravure presses are classified as "packaging" rotogravure. Subpart QQ only applies to "publication" rotogravure.
- b. Although as process emission units, the equipment is subject to 35 IAC 212.321, the emission units are not considered to be emitters of PM and therefore the PM rules will not be cited for each individual unit.

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

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)	478.30
Sulfur Dioxide (SO ₂)	0.23
Particulate Matter (PM)	2.36
Nitrogen Oxides (NO _x)	44.46
HAP, not included in VOM or PM	----
Other (O ₃)	0.42
TOTAL	525.77

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the weight percent of each HAP in the organic material emissions for each organic liquid and the organic material emissions attributable to usage of that liquid, an demonstrated capture and destruction efficiency by the control device.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the requirements of 40 CFR 63 Subpart G - National Emission Standards for Printing do not apply to the source.

5.5.3 Group-Wide Emission Limitations and Provisions

Operation of catalytic afterburners and requirements for permanent total enclosure.

The following conditions apply to the capture system for those presses and the automatic parts washer vented to the catalytic afterburners (CAs) and operation of the afterburners themselves.

- a. Presses P02, P05, and P06 and the automatic parts washer PW02 shall be located within a Permanent Total Enclosure (PTE) that meets the requirements described in 35 IAC 218 Appendix B Procedure T.
- b. Presses P03 and P04 and Laminator L31 are also vented to the CAs but not located within the PTE. All equipment vented to the catalytic afterburners have a common plenum and thus emissions are controlled by one or both catalytic afterburners.
- c. The CAs shall be operated to achieve at 95% destruction on an hourly basis of the VOM entering the afterburners. One of the afterburners may be shut down if a sufficient number of the operating presses are shut down so that the air flow from the operating presses, laminators, and parts washer do

not exceed the design capacity of the one afterburner still operating.

- d. i. The minimum inlet temperature for each CA shall be 550°F, the temperature during a recent emissions test. This temperature shall be achieved prior to operation of any individual or all Presses P02 through P06.
- ii. The CAs shall be equipped with a continuous temperature indicator and recorder for both the inlet to and outlet from each CA, and temperature rise across the catalyst bed in accordance with Section 218.105(d)(2)(A)(ii). The recorder may either be an analog recorder, i.e., a strip chart recorder, or a computer system. If a computer system is selected, the system shall be designed and operated to provide ready access at the plant to the recorded data.
- iii. Winter shut down of either CA pursuant to 218.107 is not permitted, unless air flow is low enough that one afterburner is sufficient to achieve 95% destruction.
- iv. Operation during malfunction or breakdown of the CAs is not allowed unless compliant coatings or inks are being used.
- e. i. At least once a year the catalyst bed level in each CA shall be checked and recorded.
- ii. Any addition or replacement of catalyst shall be recorded.
- iii. In odd numbered years, the VOM emissions from either or both of the CAs, as appropriate, shall be measured by an approved testing service using USEPA Test Method 25A during conditions which are representative of the maximum operating rate of equipment ducted to the afterburner. If the expected emissions are over 75 ppm then USEPA Method 25 will be used in place of Method 25A.
- iv. In even numbered years when the test required by Section eiii above is not performed, the performance of the catalyst shall be verified by a flame ionization detector (FID) similar to Method 25A to determine whether the CAs are operating at the required 95% efficiency required by Condition 5.5.3.c. The Illinois EPA shall be notified within 10 days if the

test indicates 95% destruction is not being achieved. A half traverse for determining velocities is acceptable.

- f. If any changes, e.g. changes in ventilation rates, door or window openings, or seals or closures are made in the total enclosure where Presses P02, P05, and P06 are located that may reduce the expected total capture, i.e., discharge to the afterburner or any changes are made to the afterburners, the Illinois EPA shall be notified in writing with a description of the change in accordance with Section 218.105(c)(3)(B). Notification is also required for any changes in the venting system for Presses P03 and P04 and Laminator L31.
- g. Upon written request from the Illinois EPA, within 120 days of receipt of the request, the Permittee shall test the enclosure where P02, P05, and P06 are located to verify that it continues to comply with the requirements for a PTE. The criteria in 35 IAC 218 Appendix B Procedure T shall be used.
- h. Upon written request from the Illinois EPA, within 120 days of receipt of the request, the Permittee shall test the capture efficiency for the capture system on presses P03 or P04 or Laminator L31.
- i. Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.
- j. Compliance with any annual limit in Section 7 shall be determined from a running total of 12 months of data.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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.

5.6.2 General Records for Catalytic Afterburners and Capture System for Emission Units Vented to Catalytic Afterburners

The Permittee shall maintain records of the following items to verify compliance with Section 5.5.3

- a. CA inlet temperature, continuous
- b. CA outlet temperature, continuous
- c. Catalyst bed level (yearly)
- d. Catalyst replacement and addition
- e. Annual evaluation of catalyst performance
- f. Records of operating time for the capture system, CAs, CA temperature monitors and the associated printing or coating line or parts washer.

If the capture system and catalytic afterburner are operating at normal conditions, operation/shutdown records for each associated presses, coaters, and parts washers are not required. If the capture system or catalytic afterburner is not operating, operation/shutdown records for the associated presses, coaters, and parts washers are required. The capture system operating time may be by exception report. The oxidizer operating time may be by temperature charts. The press operating time may be collected by a computerized database.

- g. Maintenance records for the capture system, control device, and temperature monitor detailing all routine and non-routine maintenance performed including dates and duration of any outages

5.6.3 Records for Each and Every Printing Press, Laminator, Extruder, or Parts Washer

The Permittee shall maintain appropriate records of coating, ink, and solvent purchases and use that will allow calculation of actual emissions of volatile organic material and enable compliance with applicable emission limits to be verified. These records shall include:

- a. A coating index, with the name or identification of each coating, its mode(s) of use, and the VOM and HAP contents as delivered to the application equipment, lb VOM/gallon less water or lb VOM/lb solids, for all formulations, as delivered to the application equipment, and

- b. For any solvent-based primer or seal strip coating used on an extrusion coater which exceeds 2.3 lb VOM/gallon, operation of the catalytic afterburner system and its capture system, its rate of application relative to the extruded material and other coatings for each day for which such coatings are used.
- c. Any other information required by 35 IAC 218.211.
- d. A printing index, with the name or identification of each ink, and the VOM and HAP content as delivered to the application equipment, lb VOM/pound or gallon of ink for all formulations, as applied.
- e. An adhesive index, with the name or identification of each adhesive, the VOM and HAP content as delivered to the application equipment and lb/VOM per gallon of adhesive, as delivered to the application equipment.
- f. Ink, coating or adhesive usage on each press, coater or laminator in pounds or gallons per day.
- g. Gallons of VOM into and out of the parts washer (daily, need not be calendar day and weekend and holiday values may be taken the day after and apportioned back based on hours operated each day).
- h. The Permittee may keep records on a "job" basis. If one job or product is made over a two or three day period, the ink used on each day may be measured only at the end of the run and apportioned backward based on square foot or other convenient measure of daily production.
- i. Records for items required in (a) through (h) above may be retained in an electronic format (e.g., computerized data base).

5.6.4 Records for Operating Scenarios

N/A

5.6.5 Retention and Availability 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 provision 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.

Operation of any equipment vented to the CAs during a malfunction of the CAs beyond the eight hours allowed by Condition 5.5.3.

5.7.2 Annual Emissions Report

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

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

- a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and
- b. The total emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the

preceding calendar year through February; 12 months in all).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

Any ink or coating may be substituted for another provided that compliance with the applicable rules listed in Condition 7.0 continue to be met, the overall source emission limits for VOM and HAPs in Conditions 5.5.1 and 5.5.2 are met.

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VARIABLE Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

- a. For the purpose of estimating HAP emissions from equipment at the source, the vapor weight percent (based on a 1992 USEPA survey) of each HAP for each product times the VOM emissions contributed by that product is acceptable.

5.10 Special Permit Shield

N/A

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
 - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are

not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 610 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 64.87 tons.
 - A. This determination includes the use of 1996 and 1997 as baseline seasons. This determination includes use of the 1997 season as a substitute for the 1994 or 1995 season due to non-representative conditions in this season as allowed by 35 IAC 205.320(a).
 - B. For the conversion of contingent ATUs into actual ATUs, the baseline years were 1999 and 2000.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units

N/A
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
- ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

- a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following

emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

Presses P07 and P08 and parts washer PW 03 have not had three years of emissions data to establish a baseline [See Condition 6.8(b)], but after a baseline is established the emissions will not be subject to further reductions.

- b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reductions requirements specified in IAC 205.400 (c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

P02, P05, P06, PW02

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Kidder Flexographic Printing Presses
Control: Common Plenum Vented to Either or Both Catalytic Afterburners

7.1.1 Description

Flexographic presses are used to print on flexible packaging used by the food industry. Emissions of VOM result from the use of printing related materials such as inks and cleaning solvents. Natural gas is used as the fuel in the press dryers.

The two flexographic presses described in this section are not located within the PTE

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
P03	Six Color Flexographic Press	Either or Both CAs
P04	Four Color Flexographic Press	Either or Both CAs

7.1.3 Applicability Provisions and Applicable Regulations

- a. An affected "flexographic press", for the purpose of these unit specific conditions, is a flexographic press subject to 35 IAC 218 Subpart H. The Permittee has chosen to use 35 IAC 218.401(c)(2) and (4) as its method of compliance. These require that the incineration system, in this case the CAs, have a destruction efficiency of at least 90% by weight and an overall reduction in VOM emissions of 65%.
- b. Each affected printing press is subject to the limits in Condition 5.2.2.

7.1.4 Non-Applicability of Regulations of Concern

- a. Affected printing lines are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.401(b), which excludes the affected printing lines.
- b. The National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK, applies to sources which are major for emissions of HAP. This source is not a major source of HAPs. (See Condition 5.5)

7.1.5 Control and Operating Requirements

- a. Each affected printing line shall only be operated with natural gas or propane as the fuel in the press dryers
- b. The capture system for both presses shall be operated so that a minimum of 93.8% of the VOM in the inks is vented to the CAs. This capture efficiency has previously been demonstrated.
- c. Both CAs, either or both of which may be the control device for these presses, shall be operated as described in Section 5.5.3.c through e.
- d. Usage of VOM in inks, cleaning solvents, and other printing materials for the two flexographic presses (P03 and P04) combined shall not exceed the following [T1N]:

VOM in Printing Materials ^a	
<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
140	1,258

^a After credit for materials sent offsite.

7.1.6 Emission Limitations

- a. In addition to Condition 5.2.2 and the source-wide emission limitations in Condition 5.5, the affected flexographic presses (P03 and P04) are subject to the following [T1N]:

VOM Emissions ^a	
<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
8.7	78.0

^a After control as required by Condition 7.1.5.b and c.

These limits ensure that the construction and/or modification at the time does not constitute a major modification pursuant to 35 IAC Part 203 or its predecessor.

- b. In addition, when Construction Permit 93090037 was issued it required 95% destruction by the CAs. This is a more stringent limit than required by 35 IAC 218.401(c)(2).

7.1.7 Testing Requirements

- a. Upon written request by the Illinois EPA, the Permittee shall determine the capture efficiency for VOM in inks used on presses PO3 and PO4. USEPA Method 204 as published in 40 CFR 51, Appendix M shall be the test method.
- b. See Section 5.5.3.e for requirements for periodic testing of the CAs to verify destruction efficiency.

7.1.8 Monitoring Requirements

See Section 5.5.3.d through f for monitoring requirements of the inlet and outlet temperatures of the CAs.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected flexographic press to demonstrate compliance with Conditions 5.5.1, 7.1.5 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Ink usage (gal or lb/mo);
- b. VOM content of each ink;
- c. VOM emissions from each press (ton/mo); and
- d. Control system requirements per Condition 5.6.2.
- e. These records may be stored in a computerized data base.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected printing presses 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:

- a. Any violation of 35 IAC 218.401(c); and
- b. The Illinois EPA must be notified 30 days in advance of a change in method of complying with 35 IAC 218.401, e.g. a change from use of control equipment per 35 IAC 218.401(c) to use of compliant coatings per 35 IAC 218.204(a) or compliant inks per 35 IAC 218.401(a) or (b).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the flexographic presses without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Inks of different composition may be used but the maximum hourly usage rate of 200 lb/hr of VOM each for Press P03 or Press P04 may not be exceeded. If the compliance method is changed from use of control equipment to use of compliant coatings, the Illinois EPA must be notified.

7.1.12 Compliance Procedures

- a. Operation of the presses ducted to the plenum which feeds the CAs and operation of the CAs in accordance with Section 5.5.3.c shall be deemed compliance with 35 IAC 218.401.
- b. Monthly emissions shall be determined by the sum for all inks:

$$\{[\text{Usage as delivered to the application equipment (gal or lb/mo)} \times \text{VOM Content (lb/gal or wt. \%)}] + [\text{Usage as added at the application equipment (gal or lb/mo)} \times \text{VOM Content (lb/gal or wt. \%)}]\} \times [\text{CE (\%/100)}] \times [1 - \text{DE (\%/100)}]$$

7.2 Unit: Laminators
 Control: Compliant coatings or vented to CAs

7.2.1 Description

Laminating is the combining of two or more materials. In extrusion laminating two sheets are joined by a hot extruded material, but one laminate may have a VOM containing primer on it. In adhesive laminating an adhesive joins the two material. Printing and/or coating may occur on each of the webs prior to being joined. All the equipment in this unit is not located within a PTE.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
L31	Mecca Laminator	Compliant Coatings or Vented to CAs
L32	Black Clawson Extrusion Laminator	None
L33/34	Egan Tandem Extrusion Laminator	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected laminator" for the purpose of these unit-specific conditions is a laminator that is subject to 35 IAC 218 Subpart F.
- b. Each affected laminator is subject to the emission limits identified in Condition 5.2.2.
- c. The L31 Mecca laminator may comply by either of two methods:
 - i. Use of coatings which comply with 35 IAC 218.204(c), that is contain less than 2.3 pounds of VOM per gallon of coating minus water and any compounds which are specifically exempted from the definition of VOM, or
 - ii. Capture of the VOM emissions and control by either or both CAs so as to comply with 35 IAC 218.207(b)(1). If this option is chosen the CAs shall operate as described in condition 5.5.3.c through e.
- d. The Egan tandem (L33/34) and Black Clawson extrusion laminator (L32) may comply by either of two methods:
 - i. Use of primers or other coatings which directly comply with 35 IAC 218.204(c), that is, each and every coating contains less than

2.3 pounds of VOM per gallon of coating minus water and any compounds which are specifically exempted from the definition of VOM, or

- ii. The daily-weighted average VOM content for each line does not exceed 2.3 lb/gal (35 IAC 218.205(a)).

7.2.4 Non-Applicability of Regulations of Concern

- a. Affected laminating or extrusion lines are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, which excludes the affected laminating or extrusion lines.
- b. Since the L31 laminator has the option to be vented to the CAs, the Permittee has elected not to use the option of complying by use of the daily-weighted average limitation of 35 IAC 218.205 or by the cross-line averaging provision of 35 IAC 218.212. Therefore, the special requirements for recordkeeping and reporting when using those provisions are not applicable.

7.2.5 Control Requirements

If the Mecca laminator (L31) complies by use of control equipment (see Condition 7.2.3(c)(ii)), then the capture and control system shall operate as described in Condition 5.5.3.c through e.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected laminators are subject to the following:

- a. Emissions of VOM from the Egan tandem extrusion laminator (L33/34) shall not exceed 4.0 ton/mo and 38.6 ton/yr [T1].
- b. L33/34 shall not use coatings which contain more than 77,200 lb/yr of VOM solvents. This includes cleanup solvent, if applicable [T1].
- c. Compliance with these limits shall be determined from a running total of 12 months of data.

The above limitations were established in Construction Permit 87040050 pursuant to 35 IAC Part 203. These limits ensure that the construction/modification addressed in the aforementioned Construction Permit does not

constitute a new major source or major modification pursuant to 35 IAC Part 203.

- d. Condition 7.2.5 requires that the Mecca laminator (L31), when complying by use of control equipment, must operate as described in Condition 5.5.3. This condition requires a destruction efficiency greater than required by 35 IAC 218.207(b)(1). This requirement was established in Construction Permit 93090037 in order to have no net increase in VOM emissions.

There are no specific emission limitations for the other two laminators, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.2.7 Testing Requirements

Testing for VOM content of coatings and adhesives used on laminators not vented to control equipment shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

- a. i. The VOM content of representative coatings and adhesives "as delivered to the application equipment" on affected laminating lines shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) whenever a new formulation is used. Coatings that are used on L31 in conjunction with control equipment are not required to be tested.
- ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation (e.g. certified product data sheets) for such testing to the Permittee and the Permittee's records pursuant to Condition 5.6.3 directly reflect the application of such material and separately account for any additions of solvent.
- b. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and adhesives used on affected laminating lines shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a). [35 IAC 218.105(a) and 218.404(a)]
- c. The CAs that will be used when coatings that do not comply with 35 IAC 218.204(c) are used are required to be tested per Condition 5.5.3.e.

7.2.8 Monitoring Requirements

The CAs that will be used when coatings that do not comply with 35 IAC 218.204(c) are used are required to be monitored by Condition 5.5.3.c.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected laminator to demonstrate compliance with Conditions 5.5.1 and 35 IAC 218 Subpart F, pursuant to Section 39.5(7)(b) of the Act:

- a. For any type of coating or adhesive the general recordkeeping requirements of Condition 5.6.3 shall be met.
- b. When coatings that do not comply with 35 IAC 218.204(c) are used on the L31 laminating line, the records for the control system described in Condition 5.6.2 shall be kept.

7.2.10 Reporting Requirements

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

- a. If the Mecca laminator (L31) uses non-complaint coating and is not vented to the CAs.
- b. The coatings used on the extrusion laminators (L32 and L33/34) do not meet the daily-weighted average requirement of 35 IAC 218.205(a).

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to laminators without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Different coatings and adhesives than described in the application may be used provided that, if necessary, the compliance method is changed. For

example, on the L31 laminator the CAs are used if any of the new coatings do not comply with 35 IAC 218.204(c) and for the adhesive laminators that if any new coating used on an individual day does not comply with 35 IAC 218.204(c) that recordkeeping necessary for use of a daily-weighted average is implemented.

7.2.12 Compliance Procedures

- a. For coatings or adhesives complying with the VOM content limits of 35 IAC 218.204(c), the VOM content shall be determined from the testing required by Condition 7.2.7. Emissions per month shall be calculated from a sum for all coatings of coating usage in gallons or pounds times VOM content in pounds per gallon or weight percent as appropriate.
- b. For coatings or adhesives complying by use of the CAs, operation of the CAs as described in Condition 5.5.3 shall be deemed compliance.
- c. Monthly emissions shall be determined by the sum of all coatings:

$$\{[\text{Usage as delivered to the application equipment (gal or lb/mo)} \times \text{VOM Content (lb/gal or wt. \%)}] + [\text{Usage as added at the application equipment (gal or lb/mo)} \times \text{VOM Content (lb/gal or wt. \%)}]\} \times [\text{CE (\%/100)}] \times [1 - \text{DE (\%/100)}]$$

- 7.3 Unit: Presses and Washer Within Total Enclosure
Control: Catalytic Afterburner (CAS)

7.3.1 Description

The two rotogravure presses, one flexographic press, and the automatic parts washer are located within a Permanent Total Enclosure (PTE). Equipment located within such an enclosure is given credit for 100% capture of the VOM. The destruction efficiency of the CAS thus becomes the overall control efficiency.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
P02	Cerutti Rotogravure Press with 13.8 mmBtu/hr Dryer	Either or Both CAS (I01/I02)
P05	W&M 6/C Flexographic Press with 4.4 mmBtu/hr Dryer	Either or Both CAS (I01/I02)
P06	Schiavi 9/C Rotogravure Press with 10.4 mmBtu/hr Dryer	Either or Both CAS or RTO (I03)
PW02	Automatic Parts Washer	Either or Both CAS or RTO (I03)

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected rotogravure press", for the purpose of these unit-specific conditions, is a press that is subject to 35 IAC 218 Subpart H and located within a PTE. The Permittee has chosen to use 35 IAC 218.401(c)(2) and (4) as its method of compliance. These rules require that the incineration system, in this case the CAS, have a destruction efficiency of at least 90% by weight and an overall reduction in VOM emissions of 65%. The Construction permits for these presses requires a higher destruction and overall control efficiency than required by Part 218. See Condition 7.3.5 and 7.3.6.
- b.
 - i. An "affected parts washer" for the purposes of these unit-specific conditions is a parts washer that is subject to 35 IAC 218.182. This rule has operating procedures and equipment requirements as listed in Attachment 1.
 - ii. Affected parts washer PW02 is subject to 35 IAC 218 Subpart G, Use of Organic Material. This rule (35 IAC 218.301) states that no person shall cause or allow emissions of more than 8 lb/hr of organic material into the atmosphere, except as provided in 35 IAC

218.302. This latter provision states that organic material emissions may exceed 8 lb/hr if 85% of the hydrocarbons are converted to carbon dioxide and water by an afterburner. Condition 7.3.5 requires that the parts washer PW02 be vented to control equipment that meets the requirements of Condition 5.5.3. This condition requires 100% capture and 95% destruction of the organic material. Therefore, compliance with Condition 5.5.3, 7.3.5 and 7.3.6 shall be deemed compliance with Condition 7.3.3.b.ii.

- c. Each affected printing press is subject to the limits in Condition 5.2.2.

7.3.4 Non-Applicability of Regulations of Concern

- a. Affected rotogravure printing presses are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.402(b), which excludes the affected presses.
- b. The National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK, applies to sources which are major for emissions of HAP. This source is not a major source of HAPs. (See Condition 5.5)

7.3.5 Control Requirements

The capture and control system for this equipment shall meet the requirements described in Condition 5.5.3.

7.3.6 Emission Limitations

- a. In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected rotogravure presses and the parts washer are subject to the following:
- b. VOM in inks and printing inks and cleanup materials and VOM emissions from these presses and parts washer shall not exceed the following [T1]:

<u>Equipment</u>	<u>VOM in Printing and Cleanup Materials</u>		<u>VOM Emissions</u>	
	<u>(ton/mo)</u>	<u>(ton/yr)</u>	<u>(ton/mo)</u>	<u>(ton/yr)</u>
PO2		820		41.0
PO5		512		25.6
PO6	90	840	90	42.0
PW02				4.4
		2,172		113.0

These limits are from construction permits 89110045 and 93090037.

- c. Condition 7.3.5 requires that the capture and control system meet the requirements described in Condition 5.5.3. The latter requires 100% capture (i.e., a PTE) and 95% destruction efficiency. Condition 7.3.6.b has specific emission limits for this equipment. These requirements were established in Construction Permits 89110045 and 93090037 in order to have no net increase in VOM emissions when these presses were built.

7.3.7 Operating and Testing Requirements

- a. Natural gas or propane shall be the only fuel fired in the dryers associated with the printing presses.
- b. The CAs that will be used as the control devices are required to be tested per Condition 5.5.3.e. In addition Condition 5.5.3.f requires the Illinois EPA to be notified of any changes that would affect the status of the PTE.

7.3.8 Monitoring Requirements

The CAs are required to be monitored by Condition 5.5.3.c.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected press or parts washer to demonstrate compliance with Conditions 5.5.1, 7.3.3, 7.3.5, and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a. For any ink or solvent used on the presses or in the parts washer, the general recordkeeping requirements of Condition 5.6.3 shall be met.
- b. For the capture and control system, the general recordkeeping requirements described in Condition 5.6.2 shall be kept.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected press or parts washer 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:

If the CAs are being used as a control device for any affected press or parts washer and the CAs malfunction and the presses continue to operate.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the presses or parts washer without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Different inks or solvents on the presses or in the parts washer may be used provided that the emission limits in Conditions 5.5.1 and 5.5.2 are not exceeded.

7.3.12 Compliance Procedures

Operation of the CAs as described in Condition 5.5.3 shall be deemed in compliance for the presses. Monthly emissions shall be calculated from the sum for all inks and solvents:

$$\{[\text{Usage as delivered to the application equipment (gal or lb/mo)} \times \text{VOM Content (lb/gal or wt. \%)}] + [\text{Usage as added at the application equipment (gal or lb/mo)} \times \text{VOM Content (lb/gal or wt. \%)}]\} \times [\text{CE (\%/100)}] \times [1 - \text{DE (\%/100)}]$$

Credit may be taken for waste ink shipped offsite provided that a percent VOM analysis has been performed.

If the integrity of the PTE has not been compromised, the capture efficiency is considered to be 100%.

7.4 Unit: Manual Parts Washer
Control: None

7.4.1 Description

The manual parts washer is used for items that cannot be cleaned in the automatic parts washer. The washer is classified as a cold cleaning degreaser. The tank is covered when not in use. Spent solvent is distilled for reuse in the distillation unit associated with the automatic parts washer.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
PW01	Manual Parts Washer	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected parts washer" for the purpose of these unit-specific conditions is a parts washer that is subject to 35 IAC 218 Subpart E and Subpart G.
- b. Each affected parts washer is subject to the emission limits in Condition 5.2.2 and the requirements listed in Attachment 1.
- c. 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 or the emissions are controlled by 85%, or the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material, pursuant to the definition in 35 IAC 211.4690. (35 IAC 218 Subpart G).

7.4.4 Non-Applicability of Regulations of Concern

N/A

7.4.5 Control Requirements

None, as the solvent currently used is not photochemically reactive and there is no odor nuisance.

7.4.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.4.7 Operating and Equipment Requirements

- a. See Attachment 1.
- b. The Permittee shall prominently post the requirement that the cover be closed when not operating.

7.4.8 Inspection Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected parts washer to demonstrate compliance with Conditions 5.5.1 and 35 IAC 218.182, pursuant to Section 39.5(7)(b) of the Act:

- a. Cleaning solvent used.
- b. Cleaning solvent recovered from washer and sent to distillation unit. The amount recovered from distillation may be apportioned with the contaminated solvent from the automatic parts washer; e.g., if 20% of contaminated solvent sent to distillation is from the manual parts washer, then 20% of amount recovered from distillation is credited to manual washer.
- c. For credit for material sent offsite for recovery, an analysis of the material must be performed.
- d. VOM emissions using material balance with information in Condition 7.4.9.a through c above.

7.4.10 Reporting Requirements

None

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the manual parts washer without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

The solvent may be changed but if the solvent is photochemically reactive pursuant to the definition in 35 IAC 211.4690 then recordkeeping will be

necessary to verify that emissions do not exceed 8 lb/hr.

7.4.12 Compliance Procedures

Emissions equal loss by material balance after recovery by distillation.

7.5 Unit: Two Rotogravure Presses, a Parts Washer and a Flexographic Press
 Control: Regenerative Thermal Oxidizer

7.5.1 Description

These two rotogravure presses (PO7 and PO8) and a parts washer (PW03) are located within a PTE separate from the one described in Section 7.2. All the emissions generated within this PTE are vented to a separate afterburner, called a regenerative thermal oxidizer (RTO). There are also four corona film treaters with integral ozone destruct systems or direct connections to the oxidizer IO3. Integral means one directly attached to each treater. P09 is a flexographic press vented to the same RTO but located in a different PTE.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
PO7	Cerutti Rotogravure Press	Afterburner IO3 (Regenerative Thermal Oxidizer)
PO8	Schiavi Rotogravure Press	Afterburner IO3 (Regenerative Thermal Oxidizer)
P09	Flexographic Press	Afterburner IO3 (Regenerative Thermal Oxidizer)
PW03	Parts Washer	Afterburner IO3 (Regenerative Thermal Oxidizer)
TR1-4	Corona Film Treaters	Each has ozone destruct system or vented to IO3

7.5.3 Applicability Provisions and Applicable Regulations

- a. An affected "rotogravure press", for the purpose of these unit specific conditions, is a rotogravure press identified in Condition 7.5.2 and subject to 35 IAC 218 Subpart H and 203 Subpart C. The requirements for the latter are much more stringent (i.e., higher control efficiency) than Part 218 and are enumerated in Conditions 7.5.5 and 7.5.6 to follow. The Part 203 requirements were established in Construction Permit 96120091.
- b. An affected "flexographic press", for the purpose of these unit specific conditions, is a flexographic press identified in Condition 7.5.2 and subject to 35 IAC Subpart H. To avoid being a major modification, the Permittee has agreed to comply with Conditions 7.5.5 and 7.5.6 to follow. The latter are much more

stringent (i.e. higher control efficiency) than Part 218 requirements and were established in Construction Permit 99020008.

- c. An affected "parts washer", for purposes of these unit specific conditions, is a parts washer subject to 35 IAC 218 Subpart E and 203 Subpart C. The requirements for Subpart E are in Attachment 1 and for the latter are enumerated in Condition 7.5.5 and 7.5.6.
- d. There are no specific rules applicable to Corona film treaters. The only limits are the controlled emission limits in 7.5.6.c.

7.5.4 Non-Applicability of Regulations of Concern

- a. Affected rotogravure printing presses are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.402(b), which excludes the affected presses.
- b. The National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK, applies to sources which are major for emissions of HAP. This source is not a major source of HAPs. (See Condition 5.5)

7.5.5 Control Requirements, Usage Limits and Work Practices [T1]

- a.
 - i. The two rotogravure presses (P07 and P08) and parts washer (PW03) shall be located in a permanent total enclosure (PTE) with all emissions of VOM vented through an afterburner (thermal oxidizer).
 - ii.
 - A. The afterburner shall be constructed and operated to achieve a VOM level in its discharge that is no more than 2% of the inlet level (at least 98% destruction efficiency) or 10 ppm (as propane), whichever is greater.
 - B. The afterburner shall be operated with a combustion chamber temperature of at least 1500°F or such lower temperature at which achievement of 99% destruction efficiency has been demonstrated by testing.
- b. All waste solvent and solvent laden rags shall be kept within the PTE until transfer to closed containers.

Conditions 7.5.5.a and b represent the Lowest Achievable Emission Rate as applied to this project, pursuant to 35 IAC 203.301, as originally included in Construction Permit 96120091.

- c. i. Flexographic press P09 shall be located in a permanent total enclosure (PTE) with 99% of all emissions of VOM vented through an afterburner (thermal oxidizer).
- ii. A. The afterburner shall be constructed and operated to achieve a VOM level in its discharge that is no more than 3% of the inlet level (at least 98% destruction efficiency) or 10 ppm (as propane), whichever is greater.
- B. The afterburner shall be operated with a combustion chamber temperature of nominally 1500°F or such lower temperature at which achievement of 99% destruction efficiency has been demonstrated by testing.
- d. All waste solvent and solvent laden rags shall be kept within the PTE until transfer to closed containers.

Conditions 7.5.5.c and d are conditions originally included in Construction Permit 99020008.

- e. i. Usage of VOM in inks, cleaning solvents, and other printing materials for the two rotogravure presses (P07 and P08) combined shall not exceed the following:

VOM in Printing Materials ^a		
(Lb/Hr) ^b	(Ton/Mo)	(Ton/Yr)

1,100	385	4,125
-------	-----	-------

^a After credit for materials sent offsite.

^b Maximum press capability. Records not required to demonstrate compliance with this limit.

- ii. VOM used in the parts washer shall not exceed 0.6 ton/day and 219 ton/yr.
- iii. Emissions of VOM from rag handling external to the PTE shall not exceed 6 lb/day and 1.1 ton/yr.

- iv. Emissions of nitrogen oxides (NO_x) from the gas-fired press dryers and thermal oxidizer shall not exceed 1.2 tons/mo and 12.0 tons/yr. Annual gas usage shall not exceed 240 million cubic feet. Emissions shall be calculated using an emission factor of 100 lbs/million ft³. Condition 7.5.5.c is required to ensure that the project will be constructed and operated in accordance with the description presented in the application.
- f. i. Usage of VOM in inks, cleaning solvents, and other printing materials for the flexographic press P09 shall not exceed the following:

VOM in Printing Materials^a
 (Lb/Hr)^b (Ton/Mo) (Ton/Yr)

200 55 650

- ^a After credit for materials sent offsite.
- ^b Maximum press capability. Records not required to demonstrate compliance with this limit.

- ii. Emissions of nitrogen oxides (NO_x) from the gas-fired press dryers shall not exceed 0.2 tons/mo and 1.3 tons/yr. Emissions shall be calculated using an emission factor of 100 lbs/million ft³.
- g. i. The afterburner (thermal oxidizer) shall be in operation at all times when the associated emission units are in operation and emitting air contaminants.
- ii. A. The afterburner combustion chamber shall be preheated to the required operating temperature prior to beginning the printing operation. This temperature shall be maintained as an hourly average during operation.
- B. The required operating, temperature for the combustion chamber shall be consistent with the average operating temperature during testing demonstrating compliance with Condition 7.5.5.a.ii, that is, if the emissions test is performed at a set point temperature higher than 1500°F in order to demonstrate 98% destruction or 99% destruction is shown at a lower set point temperature,

that higher or lower set point temperature during testing shall be the minimum set point temperature. (The set point for the temperature controller may be 25°F higher to allow for fluctuations but achieve the hourly average. That is, a recorded temperature of 1525°F during a test will be considered 1500°F.)

- iii. Notwithstanding 35 Ill. Adm. Code 215.106, seasonal shutdown of the afterburner from November 1 through March 31 of the following year is not allowed.
- iv. Operation of the presses or parts washer during malfunction or breakdown of the afterburner is not allowed. However, if it is believed that afterburner set-point temperature can be restored within 15 minutes, the emissions units do not have to be shutdown.

The above limitations (e, f and g) were established in Construction Permit 96120091 pursuant to 35 IAC Part 203 and/or Construction Permit 99020008.

7.5.6 Emission Limitations [T1]

- a. In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected rotogravure presses (P07 and P08) and parts washer (PW03) subject to the following:

VOM Emissions ^a		
(Lb/Hr)	(Ton/Mo)	(Ton/Yr)
22	7.7	82.5

- ^a After control as required by Condition 7.5.5.a and g.
- b. VOM emissions from the parts washer shall not exceed 24 lb/day and 4.38 ton/yr.
- c. Emissions of ozone from the four corona treaters combined shall not exceed 80 lb/mo and 0.42 ton/yr. These limits are based on manufacturer's ratings of ozone generated and 98% destruction by the integral ozone destruct system on each treater or control by I03.

The above limitations (a and b) were established in Construction Permit 96120091 pursuant to 35 IAC Part

203. These limits were established as a major source or major modification pursuant to 35 IAC Part 203. The LAER requirements are in Condition 7.5.5.

- d. Emissions of VOM from flexographic press P09 shall not exceed the following:

VOM Emissions ^a		
<u>(Lb/Hr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
6.0	1.8	19.5

^a After control as required by Condition 7.5.5.c and g.

The above limitations were established in Construction Permit 99020008.

7.5.7 Testing Requirements

The system which includes P07 and P08 was tested for PTE requirements and destruction efficiency in October 1998. Within 120 days of receipt of a written request by the Illinois EPA, the system shall again be tested for either or both of these requirements after the P09 system becomes operational. The PTE test procedure is described in 35 IAC 218 Appendix B Procedure T.

7.5.8 Monitoring Requirements

- a. The afterburner shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor's specifications at all times that the afterburner is in use. This device shall monitor the afterburner combustion chamber temperature.
- b. The Permittee shall prominently post instructions for all personnel entering the PTE on proper procedures to maintain the PTE, such as verifying that doors close as required and the louver system is operating properly.

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected press and parts washer to demonstrate compliance with Conditions 5.5.1 and 7.5.6, pursuant to Section 39.5(7)(b) of the Act:

- a. i. The Permittee shall collect and record the following information each day, pursuant to 35 Ill. Adm. Code 218.404(e).

- ii. Afterburner combustion chamber monitoring data.
 - iii. Records of operating time for the capture system, afterburner and its monitoring device, and the associated emission unit(s).

If the afterburner is operating at normal temperatures, operation/shutdown records for each press are not required. If the afterburner is not operating, operation/shutdown records for the presses are required.
 - iv. A maintenance record for the capture system (i.e., any critical part necessary for a PTE), afterburner, and monitoring device detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- b. The Permittee shall collect and record the following information to demonstrate compliance with Conditions 7.5.5 and 7.5.6.
- i. For the presses:
 - A. VOM content of inks and coatings and other materials used in the press.
 - B. Material usage (lb/day). For a multiday job, total material usage may be recorded on the day that the job is completed, and apportioned back to specific days.
 - ii. Solvent used for parts washing (lb/day). Need not be calendar day, e.g. meter readings may be done between 8 and 10 a.m. each day. Readings for weekend may be done on Monday morning (or Tuesday if holiday) and apportioned to hours operated each day.
- c. VOM emissions (lb/mo).
- d. The Permittee shall keep records of noncompliance with emission limits, afterburner, or PTE operating requirements.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected rotogravure press, parts washer, or Corona film treater 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:

- a. Continued operation of the presses after malfunction or breakdown of afterburner or any other reason it is not meeting the requirements of Condition 7.5.5.a, in excess of the 15 minutes allowed by Condition 7.5.5.d.
- b. VOM in printing materials, VOM used in parts washer or VOM emissions exceeding the limits in Conditions 7.5.5e or f. or 7.5.6a, b or d.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the presses and parts washer without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Different inks or solvents on the presses or in the parts washer may be used provided that the usage limits in Condition 7.5.5e or f are met.

7.5.12 Compliance Procedures

- a. Operation of the press meeting the total VOM content in Condition 7.5.5c. and operation of the afterburner as required by Condition 7.5.5a. shall be deemed in compliance.
- b. Operation of the parts washer using less than amount specified in Condition 7.5.6b., closing of the cover when not in use, and operation of the afterburner as required by Condition 7.5.5a. shall be deemed in compliance.
- c. Operation of the Corona treaters within design rating of 20 kilowatts assures compliance. The integral ozone destruct system is a "passive" control system, that is, passage of the contaminated air over the catalyst converts the ozone (O₃) to diatomic oxygen (O₂) without necessity of maintaining a set temperature or any other control variable. Ducting to afterburner I03 provides equivalent control.
- d. Monthly emissions shall be calculated from the sum for all inks and solvents:

{[Usage as delivered to the application equipment (gal or lb/mo) x VOM Content (lb/gal or wt. %)] + [Usage as added at the application equipment (gal or lb/mo) x VOM Content (lb/gal or wt. %)]} x [CE (%/100)] x [1-DE (%/100)]

If the integrity of the PTE has not been compromised, the capture efficiency is considered to be 100%.

- e. If the afterburner I03 is operated as required by Condition 7.5.5, the destruction efficiency is considered to be 98%.

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 as of the date the proposed permit for this source was issued. This shield is granted based on the Illinois EPA's review of the permit application for this source and its determination that all applicable requirements are specifically identified in this permit. If the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to the source, the Illinois EPA's written determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after May 4, 1999 (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].

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 without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this

permit following implementation of the physical or operational change and 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 [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. 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;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. 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

A report summarizing required monitoring 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
9511 West Harrison
Des Plaines, Illinois 60016
 - iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
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)(p)(ii) of the Act]:

- 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; 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.

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 compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certifications shall include descriptions of means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. 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 ATTACHMENTS

10.1 Attachment 1 Requirement for Cold Cleaning Degreasers: 35
IAC 218.182

- a. Operating Procedures: No person shall operate a cold cleaning degreaser unless:
 - i. Waste solvent is stored in covered containers only and not disposed of in such manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
 - ii. The cover of the degreaser is closed when parts are not being handled; and
 - iii. Parts are drained until dripping ceases.
- b. Equipment Requirements: No person shall operate a cold cleaning degreaser unless:
 - i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counter-weights, or a powered system if:
 - A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38°C (100°F);
 - B. The solvent is agitated; or
 - C. The solvent is heated above ambient room temperature.
 - ii. The degreaser is equipped with a device for draining cleaned parts. The drainage device shall be constructed so that parts are enclosed under the cover while draining unless:
 - A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F);
 - B. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external.
 - iii. The degreaser is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured

at 38°C (100°F) or if the solvent is heated above 50°C (120°F) or its boiling point:

- A. A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or
- B. Any other equipment or system of equivalent emission control as approved by the Illinois EPA and further processed consistent with Section 218.108 of this Part. Such a system may include a water cover, refrigerated chiller or carbon adsorber.
- c. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
- d. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.

10.2 Attachment 2 - 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: _____

DES:DGP:jar