217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Lehigh Cadillac - Direct
Attn: Timothy M. Uchwal
25th and Lexington Avenue
Broadview, Illinois 60153-4597

Application No.: 95100080 I.D. No.: 031817AAD
Applicant's Designation: Date Received: October 18, 1995
Operation of: Heatset Web Offset Lithographic Printing Presses
Date Issued: February 24, 1999 Expiration Date: February 24. 2004
Source Location: 25th and Lexington Avenue, Broadview, Cook County
Responsible Official: Damon R. Snyder

This permit is hereby granted to the above-designated Permittee to OPERATE a heatset web offset lithographic printing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: May 31, 2000
Revision Date Issued: July 10, 2000
Purpose of Revision: Administrative Amendment

This administrative amendment incorporates the construction and/or modification permitted in Construction Permit 98100035. Because the changes in the permit were only administrative, no formal public notice was issued.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this administrative amendment. 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 permit issued February 24, 1999 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 Nathan A. Frank at 217/782-2113.

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

DES:NAF:jar

cc: Illinois EPA, FOS Region 1

[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.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Lehigh Cadillac - Direct
25th and Lexington Avenue
Broadview, Illinois 60153-4597
708/681-3612

I.D. No.: 031817AAD
Standard Industrial Classification: 2752, Heatset Web Offset Lithographic Printing

1.2 Owner/Parent Company

Lehigh Press, Inc.
7001 North Park Drive
Pennsauken, New Jersey 08109

1.3 Operator

Lehigh Press-Cadillac
25th and Lexington Avenue
Broadview, Illinois 60153

Timothy M. Uchwal, Vice President and Controller
708/681-3612

1.4 General Source Description

Lehigh Press-Cadillac is located at 25th and Lexington Avenue, Broadview, Cook County. The source is involved in printing operation using heatset web offset lithographic printing presses. Heatset web offset lithographic printing involves the use of dryers to dry up the ink applied through the printing units. The emissions of VOM associated with the printing operation are controlled by afterburners.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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
ATU	Allotment Trading unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon monoxide
^0C	Degree centigrade
Ft^3	Cubic feet
^0F	Degree Fahrenheit
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
kg	kilogram
lb	pound
MACT	Maximum Achievable Control Technology
mcf	Million cubic feet
Mg	Megagram
mmBtu	Million British thermal units
mmHg	Millimeter of Mercury
mo	Month
MW	Megawatt
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
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
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
%	Percent
RMP	Risk Management Plan
SO_2	Sulfur Dioxide
T	Tons

USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
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:

9.97 mmBtu/hr Gas Fired Boiler

2.92 mmBtu/hr Gas Fired Boiler

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:

Mechanical Parts Washer

Waste Water Evaporator

Waste Paper Handling System, Bailers and Cyclones

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)].

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
Press (#32)	Heatset Web Offset Lithographic Printing Press with Dryer	November, 1968	Afterburner (2013)
Press (#34)	Heatset Web Offset Lithographic Printing Press with Dryer	August, 1966	Afterburner (Flame Oxidizer)
Press (#37)	Heatset Web Offset Lithographic Printing Press with Dryer	January, 1980	Afterburner (2013)
Press (#39)	Heatset Web Offset Lithographic Printing Press with Dryer	July, 1991	Afterburner (2013)
Press (#40)	Heatset Web Offset Lithographic Printing Press with Dryer	March, 1992	Afterburner (2013)
Press (#41)	Heatset Web Offset Lithographic Printing Press with Dryer	August, 1993	Afterburner (2013)
Press (#45)	Heatset Web Offset Lithographic Printing Press with Dryer	October, 1997	Afterburner (2046)
Press (#46)	Heatset Web Offset Lithographic Printing Press with Dryer	November, 1999	Afterburner (2013)

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.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

b. i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].

ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be

cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

c. 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.

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.

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

5.2.5 Should this stationary source, as defined in 40 CFR Part63, become subject to 40 CFR Part 63, then the owner or operator shall comply with applicable requirements of 40 CFR Part 63 by the date(s) specified in the NESHAP and shall certify compliance with the applicable requirements of 40 CFR Part 63 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.3 Non-Applicability of Regulations of Concern

None

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)	60.01
Sulfur Dioxide (SO_2)	0.05
Particulate Matter (PM)	1.95
Nitrogen Oxides (NO_x)	8.47
HAP, not included in VOM or PM	----
TOTAL	70.48

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.

5.5.3 Other Source-Wide Emission Limitations

The annual emissions from the source, not considering presses (#s 32, 34, and 37) shall not exceed the following limitations:

Pollutant	Emissions (Tons/Year)	Underlying Rules
VOM	29.34	35 IAC Part 203

The limits on VOM are limitations established in Construction Permits 93040097 and 97040088, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permits does not constitute a new major source or major modification pursuant to 35 IAC Part 203. See Condition 7.1.6.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

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 Records for Operating Scenarios

N/A

5.6.3 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.

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.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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

a. The VOM emissions from the application of inks on all presses shall be calculated based on the ink usage rate, maximum VOM content of inks used, 20% ink VOM retained on web, 80% ink evaporated in dryer and a 95% VOM destruction efficiency of the afterburners controlling the presses.

b. The VOM emissions from the use of fountain solution on all presses shall be calculated based on the maximum fountain solution used, VOM content of the fountain solution and an engineering estimate of 70% of the VOM from the fountain solution being captured and controlled by the afterburners at 95% destruction efficiency.

c. The VOM emissions from the use of diluents, autowash, adhesives and scratch off on all presses shall be based on the maximum material usage rate, VOM content of the material used and an engineering estimate of 40% of the VOM from the materials being captured and

controlled by the afterburner at 95% destruction efficiency.

d. The VOM emissions from the use of blanket wash and other VOM containing material on all presses shall be calculated based on the usage rate and the VOM content of the material used.

e. Gas combustion emissions for units with firing rate less than 10 mmBtu/hr

Pollutant	Emission Factor ($lb/10^6\ ft^3$)
NO_x	100.0
CO	84.0
PM	7.6
VOM	5.5
SO_2	0.6

These are emission factors for uncontrolled natural gas combustion for small boilers (less than 100 mmBtu/hr), Tables 1.4.1 and 1.4.2, AP-42, Volume I, Supplement D, March, 1998.

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 holds 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 205.650(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 October 31 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 158 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 17.85 tons.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Section 7 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

Not applicable.

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.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Group 1: Six Presses – Heatset Web Offset Lithographic Printing Presses

Control #1: Afterburner (2013) – All Six Presses Controlled by this Afterburner

Group 2: Press #34 – Heatset Web Offset Lithographic Printing Press

Control #2: Afterburner (Flame Oxidizer)

Group 3: Press #45 – Heatset Web Offset Lithographic Printing Press

Control #3: Afterburner (2046)

7.1.1 Description

The source is involved in printing operation using heatset web offset lithographic printing presses. Heatset web offset lithographic printing involves the use of dryers to dry up the ink applied through the printing units. The emissions of VOM associated with the printing operation are controlled by afterburners.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Press (#32)	Heatset Web Offset Lithographic Printing Press with Dryer	Afterburner (2013)
Press (#34)	Heatset Web Offset Lithographic Printing Press with Dryer	Afterburner (Flame Oxidizer)
Press (#37)	Heatset Web Offset Lithographic Printing Press with Dryer	Afterburner (2013)
Press (#39)	Heatset Web Offset Lithographic Printing Press with Dryer	Afterburner (2013)
Press (#40)	Heatset Web Offset Lithographic Printing Press with Dryer	Afterburner (2013)
Press (#41)	Heatset Web Offset Lithographic Printing Press with Dryer	Afterburner (2013)

Emission Unit	Description	Emission Control Equipment
Press (#45)	Heatset Web Offset Lithographic Printing Press with Dryer	Afterburner (2046)
Press (#46)	Heatset Web Offset Lithographic Printing Press with Dryer	Afterburner (2013)

7.1.3 Applicability Provisions and Applicable Regulations

a. An “affected press” for the purpose of these unit-specific conditions, is a heatset web offset lithographic printing line with a dryer identified in 7.1.2.

b. Each affected press is subject to the emission limits identified in Condition 5.2.2.

c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm, [35 IAC 214.301].

d. The affected printing presses are subject to 35 IAC 218 Subpart G, Use of Organic Material, which provides that:

i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.1.3(d)(ii) (see also 35 IAC 218.302) and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material [35 IAC 218.301].

ii. Emissions of organic material in excess of those permitted by Condition 7.1.3(d)(i) (see also 35 IAC 218.301) are allowable if such emissions are controlled by flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 218.302(a)].

e. On and after March 15, 1996, Pursuant to 35 IAC 218.407(a), no owner or operator of lithographic printing line(s) shall:

i. Cause or allow the operation of any heatset web offset lithographic printing line unless:

A. The total VOM content in the as-applied fountain solution meets one of the following conditions:

1. 1.6 percent or less, by volume [35 IAC 218.407(a)(1)(A)(i)];

2. 3 percent or less, by volume, and the temperature of the fountain solution is maintained below 15.6°C (60° F), measured at the reservoir or the fountain tray [35 IAC 218.407(a)(1)(A)(ii)]; or

3. 5 percent or less, by volume, and the as-applied fountain solution contains no alcohol [35 IAC 218.407(a)(1)(A)(iii)];

B. The air pressure in the dryer is maintained lower than the air pressure of the press room, such that air flow through all openings in the dryer, other than the exhaust, is into the dryer at all times when the printing line is operating [35 IAC 218.407(a)(1)(B)];

C. An afterburner is installed and operated so that VOM emissions (excluding methane and ethane) from the press dryer exhaust(s) are reduced by 90 percent, by weight, or to a maximum afterburner exhaust outlet concentration of 20 ppmv (as carbon) [35 IAC 218.407(a)(1)(C)];

D. The afterburner is equipped with the applicable monitoring equipment specified in Condition 7.1.8(e) (see also 35 IAC 218.105(d)(2)) and the monitoring equipment is installed, calibrated, operated, and maintained according to manufacturer's specifications at all times when the afterburner is in use [35 IAC 218.407(a)(1)(D)]; and

E. The afterburner is operated at all times when the printing line is in operation [35 IAC 218.407(a)(1)(E)].

ii. Cause or allow the use of a cleaning solution on any lithographic printing line unless:

A. The VOM content of the as-used cleaning solution is less than or equal to 30 percent, by weight [35 IAC 218.407(a)(4)(A)]; or

B. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F) [35 IAC 218.407(a)(4)(B)].

iii. Cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored or disposed of in any manner other than in closed containers [35 IAC 218.407(a)(5)].

f. The six affected presses (#s 37, 39, 40, 41, 45, and 46) at the source are subject to 35 IAC 212.321(a), which requires that:

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

ii. The emissions of particulate matter into the atmosphere in any one hour period from the presses shall not exceed the following emission rates specified in the following equation.

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

Where:

P = Process weight rate; and,

E = Allowable emission rate; and,

1. For process weight rates up to 408 Mg/hr (450 T/hr):

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

2. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour [35 IAC 212.321].

g. The two presses (#s 32 and 34) at the source are subject to 35 IAC 212.322(a), which requires that:

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

ii. The emissions of particulate matter into the atmosphere in any one hour period from the three presses (#s 32, 33, and 34) shall not exceed the allowable emission rates specified in the following equation.

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

Where:

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

1. For process weight rates up to 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534
C	0.0	0.0

2. For process weight rates in excess of 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16
C	- 18.4	- 40.0

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour [35 IAC 212.322].

7.1.4 Non-Applicability of Regulations of Concern

a. The affected printing presses are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 9 and 63, Subparts A and KK, because the affected printing presses are not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses and the source is not a major source of HAPs.

b. The drying ovens on the affected printing presses are not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because

the actual heat input of each unit is less than 2.9 MW (10 mmBtu/hr).

c. The drying ovens on the affected printing presses are not subject to 35 IAC 217.121, emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr).

d. The affected printing lines are not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

e. The affected printing lines are not subject to 35 IAC 218.204(c), Coating Operations/Paper Coating, as the paper coating limitation does not apply to a line on which printing is performed which complies with the emission limitations in 35 IAC 218 Subpart H: Printing and Publishing [35 IAC 218.204(c)].

7.1.5 Operational and Production limits and Work Practices

a. The afterburners (2013, 2046 and the flame oxidizer) combustion chamber shall be preheated to the manufacturer's recommended temperature but not lower than 1400°F, before the printing process is begun, and this temperature shall be maintained during operation of the affected printing lines.

b. The Permittee shall follow good operating practices for the afterburners, including periodic inspection, routine maintenance and prompt repair of defects.

c. Each affected printing press shall only be operated with natural gas as the fuel in the press dryers.

d. The ink usage and the maximum VOM content for any ink used on four affected presses (#s 39, 40, 41 and 45) shall not exceed the following limits:

Press Designation	Ink Usage (T/mo)	Ink Usage (T/yr)	Maximum Ink VOM Content (Wt. %)
Press #s 39, 40, and 41, (Combined)	42.0	420.0	45
Press #45	20.0	197.0	45

e. Fountain solution usage and maximum VOM content of the fountain solution used on four affected presses

(#s 39, 40, 41, and 45) shall not exceed the following limits:

Press Designation	Fountain Solution Usage (gal/yr)	VOM Content (lb/gal)
Press #s 39, 40, and 41 (Combined)	3,395	0.786
Press #45	770	0.786

f. Other VOM containing materials (e.g., blanket wash, auto wash etc.) usage and associated VOM content on four affected presses (#s 39, 40, 41 and 45) shall not exceed the following limits:

Press Designation	VOM Containing Materials used (gal/yr)	Maximum VOM Content (lb/gal)
Press #s 39, 40, and 41 (Combined)	4,357	6.6
Press #45	2,060	6.6

g. The afterburners (2013 and 2046) shall be operated and maintained to reduce 95 percent of the VOM emissions from the dryer exhaust.

This limit is established in Construction Permit 93040097 and also a revision to the previously issued Construction Permit 97040088, pursuant to 35 IAC Part 203. This limit ensures that the construction and/or modification addressed in the aforementioned construction permits does not constitute a new major source or major modification pursuant to 35 IAC Part 203.

7.1.6 Emission Limitations

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

a. Presses #s 39, 40, 41, and 45 are subject to the following limits:

	VOM Emissions from Inks Used (T/mo)	(T/yr)	VOM Emission from Fountain Solutions (T/yr)	VOM Emissions from Other Materials (T/yr)
Press #s 39, 40, and 41 (Combined)	0.76	6.49	0.45	12.90
Press #45	0.36	3.04	0.10	5.11

These limits are based on 20% ink solvent retention in the web, 70% capture of fountain solution for presses, 40% capture of diluents, autowash, adhesives and scratch off, and zero percent capture for other VOM, and 95% overall control by the afterburners (2013 and 2046) as required by Condition 7.1.5(g). Compliance with annual limits shall be determined by adding emissions from the present month to the emissions of the preceding 11 months.

The above limitations contain revisions to previously issued construction permits 93040097 and 97040088. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of these construction permits, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in these construction permits does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in these construction permits and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the allowable emissions from the presses #s 39, 40, 41, and 45 have been revised by reducing combined emissions from Presses #s 39, 40, and 41 and increasing emissions from Press #45.

b. Press #46 is subject to the following limits:

i. Emissions and operations of Press #46 shall not exceed the following limits:

Ink Usage (lb/hr)	Ink Usage (T/yr)	Ink VOM Content (wt. %)	VOM Emissions (lb/hr)	VOM Emissions (T/yr)
48.0	188.0	38.61	0.74	2.9

These limits are based on the maximum ink usage rate, maximum VOM content in weight percent, 20% ink retained on web, 80% ink VOM evaporated in dryer and a 95% VOM destruction efficiency of the Katec Model 2013 afterburner.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

ii. Fountain solution usage and associated VOM emissions from Press #46 shall not exceed 1.20 gal/yr and 0.4 ton/yr, respectively. These limits are based on the maximum usage and VOM content of 1.96 lbs/gal. In addition, 70% of the fountain solution is considered emitted in the dryer and hence ducted to the afterburner at 95% destruction efficiency with the remaining 30% emitted to the atmosphere.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 months total) [T1].

iii. Blanket wash usage and associated VOM emissions for Press #46 shall not exceed the following limits:

Blanket Wash Usage (gal/yr)	VOM Content (lb/gal)	VOM Emissions (lb/gal)
1,080	6.6	3.56

The emission limits are based on the maximum blanket wash usage and the maximum VOM content of the material used.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

iv. Auto wash usage and associated VOM emissions for Press #46 shall not exceed the following limits:

Auto Wash Usage (gal/yr)	VOM Content (lb/gal)	VOM Emissions (lb/gal)
248	6.33	0.49

The emission limits are based on the maximum auto wash usage, the maximum VOM content, and 40% of the material being reclaimed for reuse or to be sent offsite for disposal.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 months total) [T1].

v. Diluents usage and associated VOM emissions for Press #46 shall not exceed the following limits:

Diluents Usage (gal/yr)	VOM Content (lb/gal)	VOM Emissions (lb/gal)
50	6.7	0.10

The emission limits are based on the maximum diluents usage rate, maximum VOM content, 40% diluents captured and controlled by the afterburner with 95% VOM destruction efficiency.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 98100035, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.1.7 Testing Requirements

a. Testing to demonstrate compliance with the requirements of Condition 7.1.3(e) (see also 35 IAC

218.407) shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting such testing to allow the Illinois EPA to be present during such testing [35 IAC 218.409(a)].

b. Pursuant to 35 IAC 218.409(b), the methods and procedures of 35 IAC 218.105(d) and (f) shall be used for testing to demonstrate compliance with the requirements of Condition 7.1.3(e)(i)(C) (see also 218.407(a)(1)(C)), as follows:

i. To select the sampling sites, Method 1 or 1A, as appropriate, 40 CFR 60, Appendix A. The sampling sites for determining efficiency in reducing VOM from the dryer exhaust shall be located between the dryer exhaust and the control device inlet, and between the outlet of the control device and the exhaust to the atmosphere [35 IAC 218.409(b)(1)];

ii. To determine the volumetric flow rate of the exhaust stream, Method 2, 2A, 2C, or 2D, as appropriate, 40 CFR 60, Appendix A [35 IAC 218.409(b)(2)];

iii. To determine, pursuant to 35 IAC 218.409(b)(3), the VOM concentration of the exhaust stream entering and exiting the control device, Method 25 or 25A, as appropriate, 40 CFR 60, Appendix A. For thermal and catalytic afterburners, Method 25 must be used except under the following circumstances, in which case Method 25A must be used:

A. The allowable outlet concentration of VOM from the control device is less than 50 ppmv, as carbon [35 IAC 218.409(b)(3)(A)];

B. The VOM concentration at the inlet of the control device and the required level of control result in exhaust concentrations of VOM of 50 ppmv, or less, as carbon [35 IAC 218.409(b)(3)(B)]; and

C. Due to the high efficiency of the control device, the anticipated VOM concentration at the control device exhaust is 50 ppmv

or less, as carbon, regardless of inlet concentration. If the source elects to use Method 25A under this option, the exhaust VOM concentration must be 50 ppmv or less, as carbon, and the required destruction efficiency must be met for the source to have demonstrated compliance. If the Method 25A test results show that the required destruction efficiency apparently has been met, but the exhaust concentration is above 50 ppmv, as carbon, a retest is required. The retest shall be conducted using either Method 25 or Method 25A. If the retest is conducted using Method 25A and the test results again show that the required destruction efficiency apparently has been met, but the exhaust concentration is above 50 ppmv, as carbon, the source must retest using Method 25 [35 IAC 218.409(b)(3)(C)];

iv. Notwithstanding the criteria or requirements in Method 25 which specifies a minimum probe temperature of 129°C (265°F), the probe must be heated to at least the gas stream temperature of the dryer exhaust, typically close to 176.7°C (350°F) [35 IAC 218.409(b)(4)];

v. During testing, the printing presses shall be operated at representative operating conditions and flow rates [35 IAC 218.409(b)(5)]; and

vi. During testing, an air flow direction indicating device, such as a smoke stick, shall be used to demonstrate 100 percent emissions capture efficiency for the dryer in accordance with Condition 7.1.3(e)(i)(B) (see also 35 IAC 218.407(a)(1)(B)) [35 IAC 218.409(b)(6)].

c. Pursuant to 35 IAC 218.409(c), testing to demonstrate compliance with the VOM content limitations in Conditions 7.1.3(e)(i)(A) and 7.1.3(e)(ii)(A) (see also 35 IAC 218.407(a)(1)(A) and (a)(4)(A)), and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of 35 IAC 218.411(a)(1)(B)), shall be conducted upon request of the Illinois EPA, as follows:

i. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used; provided, however, Method 24 shall be used to demonstrate compliance [35 IAC 218.409(c)(1)]; or

ii. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a); provided, however, Method 24 shall be used to determine compliance [35 IAC 218.409(c)(2)].

d. Testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 IAC 218.110 [35 IAC 218.409(e)].

e. Testing for VOM content of inks and other printing materials shall be performed as follows [35 IAC 218.105(a) and Section 39.5(7)(b) of the Act]:

i. On at least an annual basis:

A. The VOM content of representative inks and coatings "as applied" on the affected printing press 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).

B. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(g) directly reflect the application of such material and separately account for any additions of solvent.

C. Upon written request from the Permittee, the Illinois EPA may waive this requirement on a year-by-year basis, if prior testing shows a margin of compliance

and no significant changes in ink supplies have occurred.

ii. Upon reasonable request by the Illinois EPA, the VOM content of specific inks, coatings, and cleaning solvents used on affected printing presses 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 Section 39.5(7)(b) of the Act].

f. Nothing in this section shall limit the authority of the USEPA pursuant to the Clean Air Act, as amended, to require testing.

7.1.8 Monitoring Requirements

a. Fountain Solution Temperature.

i. The owner or operator of any lithographic printing line(s) relying on the temperature of the fountain solution to demonstrate compliance shall install, maintain, and continuously operate a temperature monitor of the fountain solution in the reservoir or fountain tray, as applicable [35 IAC 218.410(a)(1)].

ii. The temperature monitor must be capable of reading with an accuracy of 0.3°C or 0.5°F, and must be attached to an automatic, continuous recording device such as a strip chart, recorder, or computer, with at least the same accuracy, that is installed, calibrated and maintained in accordance with the manufacturer's specifications. If the automatic, continuous recording device malfunctions, the owner or operator shall record the temperature of the fountain solution at least once every two operating hours. The automatic, continuous recording device shall be repaired or replaced as soon as practicable [35 IAC 218.410(a)(2)].

b. Fountain Solution VOM Content. Pursuant to 35 IAC 218.410(b), the owner or operator of any lithographic printing line(s) subject to Condition 7.1.3(e)(i)(A) (see also 35 IAC 218.407(a)(1)(A)) shall:

i. For a fountain solution to which VOM is not added automatically:

A. Maintain records of the VOM content of the fountain solution in accordance with Condition 7.1.9(d)(iii) (see also 35 IAC 218.411(c)(2)(C)) [35 IAC 218.410(b)(1)(A)]; or

B. Pursuant to 35 IAC 218.410(b)(1)(B), Take a sample of the as-applied fountain solution from the fountain tray or reservoir, as applicable, each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution in the fountain tray or reservoir, and shall determine compliance with the VOM content limitation of the as-applied fountain solution by using one of the following options:

1. With a refractometer or hydrometer with a visual, analog, or digital readout and with an accuracy of 0.5 percent. The refractometer or hydrometer must be calibrated with a standard solution for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications, against measurements performed to determine compliance. The refractometer or hydrometer must be corrected for temperature at least once per 8-hour shift or once per batch of fountain solution prepared or modified, whichever is longer [35 IAC 218.410(b)(1)(B)(i)]; or

2. With a conductivity meter if it is demonstrated that a refractometer and hydrometer cannot distinguish between compliant and noncompliant fountain solution for the type and amount of VOM in the fountain solution. A source may use a conductivity meter if it demonstrates that both hydrometers and refractometers fail to provide significantly different measurements

for standard solutions containing 95 percent, 100 percent and 105 percent of the applicable VOM content limit. The conductivity meter reading for the fountain solution must be referenced to the conductivity of the incoming water. A standard solution shall be used to calibrate the conductivity meter for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications [35 IAC 218.410(b)(1)(B)(ii)].

ii. For fountain solutions to which VOM is added at the source with automatic feed equipment, determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level. The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications [35 IAC 218.410(b)(2)].

c. Afterburners For Heatset Web Offset Lithographic Printing Line(s). Pursuant to Condition 7.1.8(e) (see also 35 IAC 218.410(c)), if an afterburner is used to demonstrate compliance, the owner or operator of a heatset web offset lithographic printing line subject to Condition 7.1.3(e)(i)(C) (see also 35 IAC 218.407(a)(1)(C)) shall:

i. Install, calibrate, maintain, and operate temperature monitoring device(s) with an accuracy of 3°C or 5°F on the afterburner in accordance with Condition 7.1.8(e) (see also 35 IAC 218.105(d)(2)) and in accordance with the manufacturer's specifications. Monitoring shall be performed at all times when the afterburner is operating [35 IAC 218.410(c)(1)]; and

ii. Install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device(s), such as a strip chart, recorder or computer, with at least the same accuracy as the temperature monitor [35 IAC 218.410(c)(2)].

d. Cleaning Solution.

i. Pursuant to 35 IAC 218.410(e)(1), the owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with Condition 7.1.3(e)(ii)(A) (see also 35 IAC 218.407(a)(4)(A)) must:

A. Pursuant to 35 IAC 218.410(e)(1)(A), for cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):

1. Install, operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed [35 IAC 218.410(e)(1)(A)(i)]; and

2. Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with Condition 7.1.3(e)(ii)(A) (see also 35 IAC 218.407(a)(4)(A)) [35 IAC 218.410(e)(1)(A)(ii)].

B. For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) as set forth in Condition 7.1.9(e) (see also 35 IAC 218.411(d)(2)) [35 IAC 218.410(e)(1)(B)].

ii. The owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with Condition 7.1.3(e)(ii)(B) (see also 35 IAC 218.407(a)(4)(B)) must keep records for such cleaning solutions used on any such line(s) as set forth in Condition 7.1.9(e)(iii) (see also 35 IAC 218.411(d)(2)(C)) [35 IAC 218.410(e)(2)].

e. An owner or operator that uses an afterburner to comply with any Section of 35 IAC Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. The continuous monitoring equipment must monitor the combustion chamber temperature for each afterburner [35 IAC 218.105(d)(2)(A)(i)].

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 printing press to demonstrate compliance with Conditions 5.5.1, 7.1.3, 7.1.5, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

a. Records of the testing of VOM content of coatings, inks, fountain solution, and cleaning solvents pursuant to Condition 7.1.7(c) through (e), which include the following [Section 39.5(7)(e) of the Act]:

   i. Identification of material tested;

   ii. Results of analysis;

   iii. Documentation of analysis methodology; and

   iv. Person performing analysis.

b. Records of the testing of the efficiency of each capture system and control device pursuant to Conditions 7.1.7(a) and (b), which include the following [Section 39.5(7)(e) of the Act]:

   i. The date, place, and time of sampling or measurements;

   ii. The date(s) analyses were performed;

   iii. The company or entity that performed the analyses;

   iv. The analytical techniques or methods used;

   v. The results of such analyses; and

   vi. The operating conditions as existing at the time of sampling or measurement.

c. Pursuant to 35 IAC 218.411(b)(3), an owner or operator of a heatset web offset lithographic printing line(s) subject to the control requirements of Condition 7.1.3(e)(i)(C) (see also 35 IAC 218.407(a)(1)(C)) shall collect and record daily the following information for each heatset web offset lithographic printing line subject to the requirements of Condition 7.1.3(e)(i)(C) (see also 35 IAC 218.407(a)(1)(C)):

i. Afterburner monitoring data in accordance with Condition 7.1.8(c) (see also 35 IAC 218.410(c)) [35 IAC 218.411(b)(3)(A)];

ii. A log of operating time for the afterburner, monitoring equipment, and the associated printing press [35 IAC 218.411(b)(3)(B)];

iii. A maintenance log for the afterburner and monitoring equipment detailing all routine and non-routine maintenance performed, including dates and duration of any outages [35 IAC 218.411(b)(3)(C)]; and

iv. A log detailing checks on the air flow direction or air pressure of the dryer and press room to insure compliance with the requirements of Condition 7.1.3(e)(i)(B) (see also 35 IAC 218.407(a)(1)(B)) at least once per 24-hour period while the line is operating [35 IAC 218.411(b)(3)(D)].

d. Pursuant to 35 IAC 218.411(c)(2), an owner or operator of a lithographic printing line subject to Condition 7.1.3(e)(i)(A) (see also 35 IAC 218.407(a)(1)(A)), shall collect and record the following information for each fountain solution:

i. The name and identification of each batch of fountain solution prepared for use on one or more lithographic printing lines, the lithographic printing line(s) or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch [35 IAC 218.411(c)(2)(A)];

ii. Pursuant to 35 IAC 218.411(c)(2)(B), if an owner or operator uses a hydrometer, refractometer, or conductivity meter, pursuant to Condition 7.1.8(b)(i)(B) (see also 35 IAC 218.410(b)(1)(B)), to demonstrate compliance

with the applicable VOM content limit in Condition 7.1.3(e)(i)(A) (see also 35 IAC 218.407(a)(1)(A)):

A. The date and time of preparation, and each subsequent modification, of the batch [35 IAC 218.411(c)(2)(B)(i)];

B. The results of each measurement taken in accordance with Condition 7.1.8(b) (see also 35 IAC 218.410(b)) [35 IAC 218.411(c)(2)(B)(ii)];

C. Documentation of the periodic calibration of the meter in accordance with the manufacturer's specifications, including date and time of calibration, personnel conducting, identity of standard solution, and resultant reading [35 IAC 218.411(c)(2)(B)(iii)]; and

D. Documentation of the periodic temperature adjustment of the meter, including date and time of adjustment, personnel conducting and results [35 IAC 218.411(c)(2)(B)(iv)].

iii. Pursuant to 35 IAC 218.411(c)(2)(C), if the VOM content of the fountain solution is determined pursuant to Condition 7.1.8(b)(i)(A) (see also 35 IAC 218.410(b)(1)(A)), for each batch of as-applied fountain solution:

A. Date and time of preparation and each subsequent modification of the batch [35 IAC 218.411(c)(2)(C)(i)];

B. Volume and VOM content of each component used in, or subsequently added to, the fountain solution batch [35 IAC 218.411(c)(2)(C)(ii)];

C. Calculated VOM content of the as-applied fountain solution [35 IAC 218.411(c)(2)(C)(iii)]; and

D. Any other information necessary to demonstrate compliance with the applicable VOM content limits in Condition 7.1.3(f)(i)(A) (see also 35 IAC

218.407(a)(1)(A)), as specified in the source's operating permit [35 IAC 218.411(c)(2)(C)(iv)].

iv. Pursuant to 35 IAC 218.411(c)(2)(D), if the owner or operator relies on the temperature of the fountain solution to comply with the requirements in Condition 7.1.3(e)(i)(A)(2) (see also 35 IAC 218.407(a)(1)(A)(ii)):

A. The temperature of the fountain solution at each printing line, as monitored in accordance with Condition 7.1.8(a) (see also 35 IAC 218.410(a)) [35 IAC 218.411(c)(2)(D)(i)]; and

B. A maintenance log for the temperature monitoring devices and automatic, continuous temperature recorders detailing all routine and non-routine maintenance performed, including dates and duration of any outages [35 IAC 218.411(c)(2)(D)(ii)].

e. Pursuant to 35 IAC 218.411(d)(2), for lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of Condition 7.1.3(e) (see also 35 IAC 218.407) shall collect and record the following information for each cleaning solution used on each lithographic printing line:

i. Pursuant to 35 IAC 218.411(d)(2)(A), for each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with Condition 7.1.3(e)(ii)(A) (see also 35 IAC 218.407(a)(4)(A)) and which is prepared at the source with automatic equipment:

A. The name and identification of each cleaning solution [35 IAC 218.411(d)(2)(A)(i)];

B. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with Condition 7.1.7(c) (see also 35 IAC 218.409(c)) [35 IAC 218.411(d)(2)(A)(ii)];

C. Each change to the setting of the automatic equipment, with date, time,

description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM) [35 IAC 218.411(d)(2)(A)(iii)];

D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution [35 IAC 218.411(d)(2)(A)(iv)];

E. The VOM content of the as-used cleaning solution, with supporting calculations [35 IAC 218.411(d)(2)(A)(v)]; and

F. A calibration log for the automatic equipment, detailing periodic checks [35 IAC 218.411(d)(2)(A)(vi)].

ii. Pursuant to 35 IAC 218.411(d)(2)(B), for each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with Condition 7.1.3(e)(ii)(A) (see also 35 IAC 218.407(a)(4)(A)), and which is not prepared at the source with automatic equipment:

A. The name and identification of each cleaning solution [35 IAC 218.411(d)(2)(B)(i)];

B. Date and time of preparation, and each subsequent modification, of the batch [35 IAC 218.411(d)(2)(B)(ii)];

C. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with Condition 7.1.7(c) (see also 35 IAC 218.409(c)) [35 IAC 218.411(d)(2)(B)(iii)];

D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution [35 IAC 218.411(d)(2)(B)(iv)]; and

E. The VOM content of the as-used cleaning solution, with supporting calculations [35 IAC 218.411(d)(2)(B)(v)].

iii. Pursuant to 35 IAC 218.411(d)(2)(C), for each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with Condition 7.1.3(e)(ii)(B) (see also 35 IAC 218.407(a)(4)(B)):

A. The name and identification of each cleaning solution [35 IAC 218.411(d)(2)(C)(i)];

B. Date and time of preparation, and each subsequent modification, of the batch [35 IAC 218.411(d)(2)(C)(ii)];

C. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with Condition 7.1.7(d) (see also 35 IAC 218.409(e)) [35 IAC 218.411(d)(2)(C)(iii)];

D. The total amount of each cleaning solvent used to prepare the as-used cleaning solution [35 IAC 218.411(d)(2)(C)(iv)]; and

E. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with Condition 7.1.7(d) (see also 35 IAC 218.409(e)) [35 IAC 218.411(d)(2)(C)(v)].

iv. The date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any [35 IAC 218.411(d)(2)(D)].

f. Records of the inks, fountain solution, blanket wash, autowash, diluents, adhesives, scratch off and any other VOM containing material usage for each affected printing press. The ink usage should be collected in ton/mo and ton/yr, the fountain solution, blanket wash, autowash, diluents, adhesives, scratch off and other VOM containing materials in gal/mo and gal/yr;

g. The VOM content of inks, fountain solution, blanket wash, autowash, diluents, adhesives, scratch off and

other VOM containing materials. The VOM content of inks in weight percent, VOM content of fountain solution, blanket wash, autowash, diluents, adhesives, scratch off and other VOM containing material in lb of VOM per gallon of material;

h. Records of VOM collected (i.e., material recovered on site and/or sent offsite for disposal or reclamation);

i. Records of the fuel usage for the press dryers on the affected printing presses, mcf/mo and mcf/yr;

j. The monthly and annual VOM emissions from each affected printing press based on the ink, fountain solution, blanket wash, autowash, diluents, adhesives, scratch off and other VOM containing material usage, with supporting calculations; and

k. Records of the monthly and annual aggregate NO_x, PM, SO_2, and VOM emissions from the press dryers on the affected printing presses shall be maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected mixer 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. Pursuant to 35 IAC 218.411(b), an owner or operator of a heatset web offset lithographic printing line(s) subject to the control requirements of Condition 7.1.3(e)(i)(C) (see also 35 IAC 218.407(a)(1)(C)) shall comply with the following:

i. Pursuant to 35 IAC 218.411(b)(2), if testing of the afterburner is conducted pursuant to Condition 7.1.7(b) (see also 35 IAC 218.409(b)), the owner or operator shall, within 90 days after conducting such testing, submit a copy of all test results to the Illinois EPA and shall submit a certification to the Illinois EPA that includes the following:

A. A declaration that all tests and calculations necessary to demonstrate

whether the affected lithographic printing presses are in compliance with Condition 7.1.3(e)(i)(C) (see also 35 IAC 218.407(a)(1)(C)) have been properly performed [35 IAC 218.411(b)(2)(A)];

B. A statement whether an affected lithographic printing press is or is not in compliance with Condition 7.1.3(e)(i)(C) (see also 35 IAC 218.407(a)(1)(C)) and a statement whether the lithographic printing press is or is not in compliance with Condition 7.1.3(e)(i)(C) (see also 35 IAC 218.407(a)(1)(C)) [35 IAC 218.411(b)(2)(B); and

C. The operating parameters of the afterburner during testing, as monitored in accordance with Condition 7.1.8(c) (see also 35 IAC 218.410(c)) as applicable [35 IAC 218.411(b)(2)(C)].

ii. On and after March 15, 1996, notify the Illinois EPA in writing of any violation of Condition 7.1.3(e)(i)(C) (see also 35 IAC 218.407(a)(1)(C)) within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation [35 IAC 218.411(b)(4)].

b. An owner or operator of a lithographic printing line subject to Condition 7.1.3(e)(i)(A) (see also 35 IAC 218.407(a)(1)(A)), shall notify the Illinois EPA in writing of any violation of Condition 7.1.3(e) (see also 35 IAC 218.407) within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation [35 IAC 218.411(c)(3)].

c. For lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of Condition 7.1.3(e) (see also 35 IAC 218.407) shall notify the Illinois EPA in writing of any violation of Section 218.407 of this Subpart within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation [35 IAC 218.411(d)(3)].

d. Emissions of VOM in excess of the limits in Condition 7.1.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

a. The VOM emissions from the application of inks on the presses (#s 32, 33, 34, 37, 39, 40, 41, and 45) shall be calculated based on the ink usage rate, maximum VOM content of inks used, 20% ink VOM retained on web, 80% ink evaporated in dryer and a 95% VOM destruction efficiency of the afterburners controlling the presses.

b. The VOM emissions from the use of fountain solution on the presses (#s 32, 33, 34, 37, 39, 40, 41, and 45) shall be calculated based on the maximum fountain solution used, VOM content of the fountain solution and an engineering estimate of 70% of the VOM from the fountain solution being captured and controlled by the afterburners at 95% destruction efficiency.

c. The VOM emissions from the use of diluents, autowash, adhesives and scratch off on presses (#s 32, 33, 34, 37, 39, 40, 41, and 45) shall be based on the maximum material usage rate, VOM content of the materials used and an engineering estimate of 40% of the VOM from the materials being captured and controlled by the afterburners at 95% destruction efficiency.

d. The VOM emissions from the use of blanket wash and other VOM containing material on all presses shall be calculated based on the usage rate and the VOM content of the material used.

e. Gas combustion emissions for units with firing rate less than 10 mmBtu/hr.

Pollutant	Emission Factor ($lb/10^6\ ft^3$)
NO_x	100.0
CO	84.0
PM	7.6
VOM	5.5
SO_2	0.6

These are emission factors for uncontrolled natural gas combustion for small boilers (less then 100 mmBtu/hr), Tables 1.4.1 and 1.4.2, AP-42, Volume I, Supplement F, March, 1998.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after August 5, 1998 (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]:

Monitoring Period	Report Due Date
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 (MC 40)
Bureau of Air
Compliance Section
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

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

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 (AR - 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.

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 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)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Summary of Equipment

TABLE 1-1

Unit Number	Date Installed	Emission Unit Number	Description
1	November, 1968	Press (#32)	Heatset Web Offset Lithographic Printing Press with Dryer Controlled by Afterburner (2013)
2	April, 1971	Press (#33)	Heatset Web Offset Lithographic Printing Press with Dryer Controlled by Afterburner (2013)
3	August, 1966	Press (#34)	Heatset Web Offset Lithographic Printing Press with Dryer Controlled By Afterburner (Flame Oxidizer)
4	January, 1980	Press (#37)	Heatset Web Offset Lithographic Printing Press with Dryer Controlled by Afterburner (2013)
5	July, 1991	Press (#39)	Heatset Web Offset Lithographic Printing Press with Dryer Controlled by Afterburner (2013)
6	March, 1992	Press (#40)	Heatset Web Offset Lithographic Printing Press with Dryer Controlled by Afterburner (2013)
7	August, 1993	Press (#41)	Heatset Web Offset Lithographic Printing Press with Dryer Controlled by Afterburner (2013)
8	October, 1997	Press (#45)	Heatset Web Offset Lithographic Printing Press with Dryer Controlled by Afterburner (2046)

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: _____

RS:jar

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. Unlike this source's current state operating permit(s), the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Lehigh Press-Cadillac is located at 25th and Lexington Avenue, Broadview, Cook County. The source is involved in printing operation using heatset web offset lithographic printing presses. Heatset web offset lithographic printing involves the use of dryers to dry up the ink applied through the printing units. The emissions of VOM associated with the printing operation are controlled by afterburners.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
Press (#32)	Heatset Web Offset Lithographic Printing Press with Dryer	November, 1968	Afterburner (2013)
Press (#33)	Heatset Web Offset Lithographic Printing Press with Dryer	April, 1971	Afterburner (2013)
Press (#34)	Heatset Web Offset Lithographic Printing Press with Dryer	August, 1966	Afterburner (Flame Oxidizer)
Press (#37)	Heatset Web Offset Lithographic Printing Press with Dryer	January, 1980	Afterburner (2013)
Press (#39)	Heatset Web Offset Lithographic Printing Press with Dryer	July, 1991	Afterburner (2013)
Press (#40)	Heatset Web Offset Lithographic Printing Press with Dryer	March, 1992	Afterburner (2013)
Press (#41)	Heatset Web Offset Lithographic Printing Press with Dryer	August, 1993	Afterburner (2013)
Press (#45)	Heatset Web Offset Lithographic Printing Press with Dryer	October, 1997	Afterburner (2046)

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions. The proposed permit limits the maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source limit.

For purposes of fees, the source is allowed the following emissions:

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)	52.89
Sulfur Dioxide (SO_2)	0.05
Particulate Matter (PM)	0.60
Nitrogen Oxides (NO_x)	7.29
HAP, not included in VOM or PM	-
TOTAL	60.83

The CAAPP permit contains revisions to the previously issued construction permit(s), however, these revisions do not allow emissions above those permitted in the construction permit(s). The Source has requested that the Illinois EPA establish conditions in the CAAPP permit that allow various refinements from the conditions of the construction permit(s), consistent with the information provided in the CAAPP application. These revisions do not change the status of compliance with the applicable emission standards as discussed below.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board’s emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

A CAAPP permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source’s permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

RS:jar