

217/782-2113

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

PERMITTEE:

Clear Lam Packaging, Inc.
Attn: Thomas Wedoff, Vice President, Finance
1950 Pratt Boulevard
Elk Grove Village, Illinois 60007

I.D. No.: 031440AHX
Application No.: 95090246

Date Received: July 9, 2004
Date Issued: TO BE DETERMINED
Expiration Date¹: TO BE DETERMINED

Operation of: Flexible Packaging Lamination and Printing Operation
Source Location: 1950 Pratt Boulevard, Elk Grove Village, Cook County, 60007
Responsible Official: Thomas Wedoff, Vice President, Finance

This permit is hereby granted to the above-designated Permittee to OPERATE a Flexible Packaging Lamination and Printing Operation, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

DES:DGP:psj

cc: Illinois EPA, FOS, Region 1
CES
Lotus Notes

¹ This permit contains terms and conditions that address the applicability, and, if determined applicable, substantive requirements of Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. The authority for these provisions is found in these regulations and in the general authority provided to the Illinois EPA by Section 9.1 of the Environmental Protection Act (Act) and Sections 39(a) and 39.5(7)(a) of the Act, which authorize the Illinois EPA to include conditions in permits that are required to accomplish the purposes of the Act. Any such terms and conditions are specifically identified within this permit as T1 conditions. These terms and conditions continue in effect as provided by Condition 8.7 of this permit, notwithstanding the expiration date specified above, as their authority derives from Title I, as well as from Title V of the CAA.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Clear Lam Packaging, Inc.
1950 Pratt Boulevard
Elk Grove Village, Illinois 60007
847-439-8570

I.D. No.: 031440AHX
County: Cook
Standard Industrial Classification: 2671, Packaging/Printing

1.2 Owner/Parent Company

Clear Lam Packaging, Inc.
1950 Pratt Boulevard
Elk Grove Village, Illinois 60007

1.3 Operator

Clear Lam Packaging, Inc.
1950 Pratt Boulevard
Elk Grove Village, Illinois 60007

Thomas Wedoff, Vice President, Finance
847-439-8570

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois 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
BACT	Best Available Control Technology
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
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
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 CONDITIONS FOR 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:

Laminator #5

- 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:

None

- 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)].

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

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission

limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 218.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.2.3 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia at 70 °F, the Permittee shall comply with the applicable requirements of 35 IAC 218.122, which requires use of a permanent submerged loading pipe, submerged fill, or a vapor recovery system.

3.3 Addition of Insignificant Activities

3.3.1 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).

3.3.2 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.

3.3.3 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
01	Laminator Line L-1	1987	Reeco Thermal Oxidizers 1 & 2 and Concentrator/Oxidizer
	Laminator Line L-2	Pre-1985	
	Laminator Line L-3	Pre-1985	
	Laminator Line L-4	Pre-1985	
	Flexographic Press FP-1	Pre-1985	
	Flexographic Press FP-4	1987	
	Flexographic Press FP-5	1987	
	Flexographic Press FP-6	1995	
	Flexographic Press FP-7	1995	
	Flexographic Press FP-8	1995	
	Flexographic Press FP-9	2000	
Flexographic Press FP-10	2002		
02	Storage Tanks	----	Submerged Loading

5.0 OVERALL SOURCE CONDITIONS

5.1 General Source Description

- 5.1.1 The source manufactures flexible packaging materials for food and consumer products. The primary emission units at the source include laminating operations and flexographic printing. In addition, there are storage tanks for inks, adhesives and solvents.
- 5.1.2 This source is located in an area that is in non-attainment of the National Ambient Air Quality Standards for ozone and PM_{2.5} and attainment for all other pollutants.

5.2 Major Source Status

- 5.2.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

5.3 General Applicable Provisions and Regulations

- 5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.
- 5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability:
- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
 - b. Pursuant to 35 IAC 212.123(a), 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, except as allowed by 35 IAC 212.123(b) and 212.124.
 - c. Pursuant to 35 IAC 237.102, no person shall cause or allow open burning, except the Illinois EPA may grant permits for open burning in accordance with 35 IAC 237.201.
- 5.3.3 Fugitive Particulate Matter Operating Program
- a. 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)].

- b. 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].
- c. 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].

5.3.4 Ozone Depleting Substances

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

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

5.3.5 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.6 Future Emission Standards

- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC

Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new regulations (see Condition 9.12.2).

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable regulations under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B that were promulgated after the date issued of this permit.

5.3.7 NESHAP Requirements

- a. The final rule for Paper and Other Web Coating under the NESHAP, 40 CFR 63 Subpart JJJJ (40 CFR 63.3280 through 63.3420 plus Tables) was published on December 4, 2002. An existing source, such as operated by the Permittee, has until December 5, 2005 to achieve compliance with the HAP emission rules.
- b. The web coating operations may comply by limiting the amount of HAPs in the coating (either as a maximum specified percent of the coating material or percent of coating solids and calculated on a monthly basis) or by reducing the amount of HAPs by the use of control equipment [40 CFR 63.3320].
- c. As of the dates required by the rule, the Permittee shall comply with the following:
 - i. The notification requirements of 40 CFR 63.3400 and the applicable requirements in 40 CFR Subpart A (63.7 to 63.9).
 - ii. The performance test requirements of 40 CFR 63.3360.
 - iii. The recordkeeping requirements of 40 CFR 63.3410.
 - iv. The reporting requirements of 40 CFR 63.3400.
 - v. If control equipment is used, the monitoring requirements for the control device and the capture system specified in 40 CFR 63.3350 must be met.
- d. The web coating units that emit HAPs are also subject to the general requirements 40 CFR 63 Subpart A (63.1 to 63.15). One of these requirements for units that comply by

use of control equipment is to have a Startup, Shutdown and Malfunction Plan as required by 40 CFR 63.6(e)(3) by the final compliance date. It should be noted that the same control equipment that will be used to comply with Subpart JJJJ is currently used to comply with 35 IAC 218.207 and 40 CFR 63 Subpart KK. Therefore, the startup, shutdown and malfunction plan that meets the requirements to comply with Subpart KK should also comply with the Subpart JJJJ requirement.

- e. This NESHAP rule was described here in Section 5 but the actual equipment affected is in Section 7. The Illinois EPA currently considers the laminators subject to Subpart JJJJ and the flexographic presses subject to Subpart KK. Note that any laminators classified as insignificant units due to the use of water-based adhesives are still required to maintain records of the VOM content of the adhesives to demonstrate compliance with Subpart JJJJ.
- f. The Permittee has the option to become minor for HAPs prior to December 5, 2005 in which case Subpart JJJJ would not be applicable.

5.3.8 Episode Action Plan

- a. Pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.
- d. A copy of the original plan and any subsequent revisions shall also be sent to the Cook County Department of Environmental Control.

5.4 General Non-Applicability of Regulations of Concern

General non-applicability of regulations of concern are not set for this source. However, there may be unit specific non-applicability of regulations of concern set forth in Section 7 of this permit.

5.4.1 This permit is issued based on the source not being subject to 35 IAC Part 218, Subpart G, because the source has printing and laminating operations that are subject to 35 IAC 218 Subparts F and H. (35 IAC 218.209 and 218.402(b))

5.5 General Source-Wide Control Requirements and Work Practices

General source-wide control requirements and work practices are not set for this source. However, there are source-wide requirements in the Standard Permit Conditions in Section 9. There may also be requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 General Source-Wide Production and Emission Limitations

5.6.1 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 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	147.0
Sulfur Dioxide (SO ₂)	0.053
Particulate Matter (PM)	0.89
Nitrogen Oxides (NO _x)	8.42
HAP, not included in VOM or PM	0
Total	156.363

5.6.2 Emissions of Hazardous Air Pollutants

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

5.6.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, state rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 General Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].
- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 General Monitoring Requirements

General monitoring requirements are not set for this source. However, there may be provisions for unit specific monitoring set forth in Section 7 of this permit.

5.9 General Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 Records for HAP Emissions

- a. The Permittee shall maintain records of HAP emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit, pursuant to Section 39.5(7) (b) of the Act.
- b. After December 5, 2005 any unit classified as insignificant and listed in Section 3.0 of the Permit must still maintain records of the HAP content of the adhesives used in order to demonstrate compliance with 40 CFR Subpart JJJJ (Web Coating). These records may be Certified Product Data Sheets or Material Safety Data Sheets.

5.9.3 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.

5.10 General Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source 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. There are also reporting requirements for specific emission units set forth in Section 7 of this permit.

5.10.2 Annual Emissions Report

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

5.11 General Operational Flexibility/Anticipated Operating Scenarios

Pursuant to Section 39.5(7) (1) (i) of the Act, the Permittee is authorized to make the following physical or operational changes

without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Laminators #1 - #4 are currently located within a permanent total enclosure (PTE) and vented to a control device (thermal oxidizer) for control of both VOM and HAP emissions. Laminator #5 uses only water-based adhesives and is considered an insignificant emission unit (See Section 3.1.1 of this permit). If Laminators #1 - #4 (any individual one or all) begin to use water-based adhesives that can qualify them as insignificant emission units, they may be moved to outside the PTE with a letter notification to the Illinois EPA Permit Section and Field Office but without having to modify this permit. This type or change was approved by Construction Permit 04010040.

If the Permittee intends to move a laminator from inside the PTE to outside the PTE, such that it complies with both the 35 IAC 218.204(c) and 40 CFR 63 Subpart JJJJ by use of compliance coatings instead of the use of the current control device, but not meeting the definition of an insignificant emission unit, then a construction permit and modification of this permit is required.

5.12 General Compliance Procedures

5.12.1 General Procedures for Calculating Emissions

- a. Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be based on the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

6.1 Emissions Reduction Market System (ERMS)

6.1.1 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 reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. 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 in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable 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 transaction account to cover its actual VOM emissions during the preceding season. A transaction 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 transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction 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 emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 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" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.1.2 Applicability

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

6.1.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.1.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of 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 6.1.5.
 - i. VOM emissions from insignificant emission 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 in Section 7.0 of 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 Condition 6.1.8(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 seasonal 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.

6.1.4 Market Transactions

- 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.

6.1.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.1.3, 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 the 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 emissions 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 after 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.

6.1.6 Quantification of Seasonal VOM Emissions

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

No exceptions

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

6.1.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions 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 35 IAC 205.337;
 - 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 is not

yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by November 31 of each year, for the preceding seasonal allotment period.

6.1.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 557 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 63.2868 tons per season.
 - A. This determination includes the use of 1994 and 1995 as baseline seasons.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.1.10 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 6.1.3(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
None
- 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 emissions 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.

6.1.9 Recordkeeping for ERMS

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

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.1.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.1.10 Exclusions from Further Reductions

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

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

None

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

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because

these emission units use BAT for controlling VOM emissions
as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Laminators and Flexographic Presses

7.1.1 Description

Four laminators are utilized to laminate plastic film to form flexible packaging products. Eight flexographic presses are used to print on plastic films and paper substrates. The lines are similar units in that all are equipped with natural gas dryers, permanent total enclosure capture devices, and a thermal oxidation system.

In addition to the thermal oxidizers that have been in operation for a number of years, the Permittee has recently installed a concentrator/oxidizer to remove contaminated air from the area inside the PTE where employees are located. It is not necessary to operate the unit to comply with the regulations, but when it does operate it must achieve the same capture and destruction efficiency needed to comply with the NESHAP. For example it might capture only 20% of the total air in the PTE (with the remainder going to the thermal oxidizers), but 95% of the VOM in that portion must be destructed and monitoring and recordkeeping must meet NESHAP requirements.

The concentrator portion of the system is similar to a carbon adsorber except that the material is a zeolite sorbent and the VOM after being desorbed is vented to a catalytic oxidizer.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	Date of Construction
L1	Laminator No. 1 & Dryer (3.2 mmBtu/hr)	Reeco Thermal Oxidizers 1 & 2 and Concentrator/Oxidizer ^a	1987
L2	Laminator No. 2 & Dryer (1.6 mmBtu/hr)		Pre-1985
L3	Laminator No. 3 & Dryer (1.2 mmBtu/hr)		Pre-1985
L4	Laminator No. 4 & Dryer (1.2 mmBtu/hr)		Pre-1985
FP1	Flexographic Press No. 1 & Dryer (2.0 mmBtu/hr)		Pre-1985
FP4	Flexographic Press No. 1 & Dryer (2.0 mmBtu/hr)		1987
FP5	Flexographic Press No. 1 & Dryer (2.0 mmBtu/hr)		1987
FP6	Flexographic Press No. 1 & Dryer (1.57 mmBtu/hr)		1995
FP7	Flexographic Press No. 1 & Dryer (1.57 mmBtu/hr)	1995	
FP8	Flexographic Press No. 1 & Dryer (2.0 mmBtu/hr)	1995	

Emission Unit	Description	Emission Control Equipment	Date of Construction
FP9	Flexographic Press No. 9 & Dryer (2.0 mmBtu/hr)	Reeco Thermal Oxidizers 1 & 2	2000
FP10	Flexographic Press No. 10 & Dryer (1.57 mmBtu/hr)	and Concentrator/Oxidizer ^a	2004

^a The concentrator/oxidizer is not required to achieve compliance but when it does operate it must meet specific requirements.

7.1.3 Applicable Provisions and Regulations

- a. The "affected laminators" for the purpose of these unit-specific conditions, are laminators described in Conditions 7.1.1 and 7.1.2.

The "affected flexographic presses" for the purpose of these unit-specific conditions, are flexographic presses described in Conditions 7.1.1 and 7.1.2.

- b. Each affected laminator or flexographic press is subject to the emission limits identified in Condition 5.3.2.
- c. The laminating lines shall be equipped with capture systems and control devices that provide 81 percent reduction in the overall emissions of VOM from each line and each control device is required to be 90 percent efficient [35 IAC 218.207]. It should be noted Condition 7.1.5(b) requires the overall VOM control of the thermal oxidizers to be 94 percent which is greater than this applicable regulation.
- d. The flexographic presses shall be equipped with capture systems and control devices that provide 60 percent reduction in the overall emissions of VOM from each line and each control device is required to be 90 percent efficient [35 IAC 218.401(c)]. It should be noted Condition 7.1.5(b) requires the overall VOM control of the thermal oxidizers to be 94 percent, which is greater than this applicable regulation.
- e. The affected laminator and flexographic presses are subject to 35 IAC 212.321(a), which provides that:

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 (see also Attachment 1) [35 IAC 212.321(a)].

- f. The affected flexographic presses are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A and KK, because the source is a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2, at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated. The Illinois EPA administers the NESHAP for subject sources in Illinois pursuant to a delegation agreement with the USEPA.

The standards for wide-web flexographic printing are listed in 40 CFR 63.825 with main methods to comply but with variations such as use of a monthly average. These are as follows:

- i. Emissions capture and control equipment that reduces HAP emissions by 95% (5% of the amount used);
 - ii. Limit HAP content to 4% of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners and other materials applied; or
 - iii. Limit HAP emissions to 20% of the mass of solids applied; or
 - iv. Combinations of the above such as if the HAP content is greater than 4% and control efficiency less than 95%, the two may be combined to reduce HAP content to under 4% after control.
- g. Table 1 of Subpart KK lists the requirements of Subpart A that are applicable. One item is hereby specifically noted, that is, the requirement for a Startup, Shutdown and Malfunction (SS & M) Plan per 40 CFR 63.6(e)(3). The Permittee is required to prepare and follow a written plan for the regenerative thermal oxidizers. A SS & M Plan is not required for the concentrator/oxidizer since it may be shutdown and the presses will remain in compliance as long as the thermal oxidizers continue to operate. However, there must be a procedure to stop the air flow through the oxidizer if the oxidizer is not achieving the required destruction.

7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the source not being subject to 35 IAC Part 218, Subpart G, because the source has printing and laminating operations that are subject to 35 IAC 218 Subparts F and H. (35 IAC 218.209 and 218.402(b).
- b. This permit is issued based on the affected flexographic presses not being subject to 40 CFR Part 64, Compliance

Assurance Monitoring (CAM) for Major Stationary Sources, because the affected flexographic presses are subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i). Although the laminators are not subject to a NESHAP until December 5, 2005, since the laminators are vented to the same control device as the flexographic presses, they are also not subject to CAM.

7.1.5 Control Requirements and Work Practices

- a. The HAP content of the materials used on the flexographic presses in conjunction with the regenerative thermal oxidizer control device and the concentrator/oxidizer if it is operating shall be managed to comply with the MACT requirement of 40 CFR 63.825.

After December 5, 2005, the HAP content of the materials used on the laminators in conjunction with the regenerative thermal oxidizer control device and the concentrator/oxidizer, if it is operating, shall be managed to comply with the MACT requirement of 40 CFR 63.3320.

- b. The capture system and afterburner on the affected laminators and flexographic presses shall be operated to achieve 94% overall control of VOM attributable to coatings and adhesives. This is a consequence of the conditions imposed in Construction Permit 94120012. [T1] Note that this supersedes the requirement of 35 IAC 218.207(b)(1) and 218.401(c), which requires that an overall reduction of at least 81 percent be attained from the laminators and at least 60 percent be attained from the flexographic presses. In the event that this requirement is less stringent than the requirement of Condition 7.1.5(a) above, the requirement of Condition 7.1.5(a) takes precedence. Note that 40 CFR 63.3320 applies only to HAPs, while Part 218 applies to VOM.
- c.
 - i. The capture system and thermal oxidizers are to be operated at all times when the affected laminators and flexographic presses are in operation. The concentrator/oxidizer is an optional control device that is not required to be operated but when it does operate must meet the overall control efficiency specified above.
 - ii. Notwithstanding 35 IAC 218.106, seasonal shutdown of either thermal oxidizer from November 1 through March 31 of the following year is not allowed.
- d. The capture systems on each affected laminator and flexographic press shall be designed, operated, and maintained to provide permanent total enclosure, in accordance with the criteria in 35 IAC Part 218, Appendix B, Procedure T. If the enclosure fails to meet USEPA's "Guidance on Addressing

Capture Efficiency in Enforcing VOC SIP Regulations" the enclosure shall be upgraded. For compliance with Condition 7.1.3(f), the capture efficiency must be 100%. It is assumed to be 100% if it meets the criteria in Procedure T, Appendix B of 40 CFR 52.741, which is identical to the same procedure in Part 218 cited above. [40 CFR 63.827(e) (1)]

- e. i. The thermal oxidizer's combustion chambers shall be preheated to the manufacturer's recommended temperature but not lower than 1400 degrees F, before the laminating process is begun; this temperature shall be maintained during the laminating and printing processes.
- ii. The catalytic oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, before any regeneration from the concentrator begins, and this temperature shall be maintained during the regeneration of the concentrator. It should be noted that at the time of issuance of this CAAPP permit a compliance test, as required by Construction Permit No. 04010040 may not yet have been performed in which case the manufacturer's recommended temperature shall be used. The manufacturer may also specify an inlet temperature rather than a combustion chamber temperature.
- f. The dryers and oxidizers for each affected laminator and flexographic press shall only use natural gas for fuel.

7.1.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected laminators and printing presses are subject to the following:

- a. Usage of VOM containing materials on the presses and laminators below shall not exceed the following limits:

		VOM Within Printing/Laminating Solvents		VOM Within Inks/Adhesives	
		<u>(lb/mo)</u>	<u>(T/Yr)</u>	<u>(lb/mo)</u>	<u>(T/Yr)</u>
Group 1:	FP 6, 7, and 8	44,506	222	38,827	193
Group 2:	FP 1, 4, 5, L1 L2, L3, and L4	<u>115,052</u>	<u>641</u>	<u>184,948</u>	<u>1,017</u>
Totals:	All Presses and Laminators Except 9 and 10	159,558	863	223,775	1,210
FP10		19,780	99	17,256	86

- b. Based upon the above usage rates, emissions of VOM from the following presses shall not exceed the following limits [T1]:

Construction Permit #94120012:

	VOM Emissions	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Group 1: FP 6, 7 and 8	2.5	24.9
Group 2: FP 1, 4, 5, L1, L2, L3 and L4	<u>9.0</u>	<u>99.9</u>
Totals: All Presses and Laminators	11.5	124.8

Construction Permit #00030115 and 01020035:

	VOM Emissions	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
FP-9	1.1	11.1
FP-10	1.1	11.1

- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). These limits were established in the Permits listed above [T1].
- d. The above limitations were established in the Permits referenced, 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. Upon request by the Illinois EPA, the VOM contents of coatings, inks, etc., and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 [35 IAC 218.211(a)].
- b. If the Permittee wishes to obtain credit for the cleaning solvents sent off-site, then the percent concentration of solvent in the waste shall be determined in accordance with USEPA reference methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a). This analysis may be performed by the receiver of the waste material.
- c. If compliance with the MACT requirement of 40 CFR 63.825 is not determined solely by the capture and control efficiency of the regenerative thermal oxidizer, then the HAP weight fraction of the various inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, diluents

and other materials shall be determined in accordance with Method 311 of Appendix A of Part 63. The determination may be made by the manufacturer of the material [40 CFR 63.827(b)(2)(i)]. Formulation data may be used if it meets the requirements of 40 CFR 63.827(b)(a)(iii).

7.1.8 Monitoring Requirements

The Permittee shall operate in accordance with the following requirements pursuant to Section 39.5(7)(b) of the Act:

- a. Each thermal oxidizer shall be equipped with continuous temperature indicator and strip chart recorder or disk storage for the combustion chamber temperature, pursuant to 35 IAC 218.105(d)(2)(A)(i). Each afterburner shall be preheated and operated with a minimum temperature of 1400 degrees F and have 94% volatile organic material (VOM) and hazardous air pollutant (HAP) combined capture and destruction efficiency.
- b.
 - i. For each thermal oxidizer install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder, pursuant to 40 CFR 63.828(a)(4)(i). The device shall have an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.
 - ii. For the catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.
- c. The concentrator shall be equipped with a monitoring device which is installed, calibrated, maintained, and operated according to vendor specifications at all times the concentrator is in use. This device shall monitor the VOM concentration of the concentrator exhaust.
- d. Comply with the other requirements of 40 CFR 63.828 such as those that require the permanent total enclosure (i.e. capture efficiency) with no bypass except during emergency. This shall include installing, calibrating, maintaining and operating according to the manufacturer's specifications a flow control position indicator that provides a record indicating whether the exhaust stream from the PTE is directed to the thermal oxidizer or was diverted from it.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected laminators and flexographic presses to demonstrate compliance with Conditions 5.6.1, 7.1.3, 7.1.5 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Control device monitoring data each day the oxidizers and concentrator operate. [35 IAC 218.211(e)(2)(B)]
- b. A log of the operating time for the capture system, control device, monitoring equipment and the printing/coating operation [35 IAC 218.211(e)(2)(C)].
- c. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages [35 IAC 218.211(e)(2)(D)].
- d. For each group of emission unit:
 - i. Date;
 - ii. Product;
 - iii. Adhesive, ink, or solvent code;
 - iv. Gallons of adhesive used per month;
 - v. Gallons of ink used per month; and.
 - vi. Gallons of coating and laminating solvent used per month.
- e. For each adhesive, ink, and solvent used, a record of the following information shall be kept at the facility and updated as new adhesives and inks are added:
 - i. Identification code of adhesive, ink, or solvent;
 - ii. Description of adhesive, ink, or solvent;
 - iii. Supplier of adhesive, ink, or solvent;
 - iv. Supplier's identification code or product number;
 - v. VOM, HAP and solids content^a as supplied, in pounds VOM per gallon of coating minus water; and
 - vi. Density of adhesive, ink or solvent.

- ^a HAP and solids content only required if necessary to calculate compliance with 40 CFR 63.825.
- f. Monthly VOM emissions from each group of affected laminators and flexographic presses calculated in accordance with Condition 7.1.12.
- g. Natural gas consumption (mmft³)
- h. The most recent stack test report for each oxidizer.
- i. Any other records required by 40 CFR 63 Subpart A or §63.829 for the flexographic printing presses.
- j. After December 5, 2005 any other records required by 40 CFR 63 Subpart A or 63.3410 for the laminators.

7.1.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected laminators and flexographic presses with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:
 - i. Report of Deviations

If there is an exceedance of the requirements of this permit as determined by the records required by this permit or by other means, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].
 - ii. Each monitoring period as described in Condition 8.6.1, a written report of all failures to meet the temperature requirement shall be submitted in the form of a Semiannual Report. For purposes of this report, each 60 minute period in which the afterburner's average temperature is not maintained greater than 1400 degrees F and a laminator or flexographic press is being operated is considered to be a failure event. The Semiannual Report shall be submitted as stated in Condition 8.6.1 and include the following information:
 - A. Time;

- B. Duration
 - C. Actual temperature;
 - D. Cause of failure; and
 - E. Corrective action taken.
- b. Report for Changing Method of Compliance
- i. The Permittee shall certify compliance with the Illinois EPA at least 30 calendar days before changing the method of compliance with 35 IAC 218.207 [35 IAC 218.211(e) (3) (B)].
 - ii. The Permittee shall also notify the Illinois EPA if the method of complying with 40 CFR 63.825 within 30 days after the change. The Permittee may combine notifications, that is the one for Part 218 may be combined with the one for Subpart KK.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

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

The inks, coatings adhesives and other materials may be changed provided the source continues to comply with all of the conditions in Section 7.1.2.

7.1.12 Compliance Procedures

- a. Compliance with Conditions 7.1.3(c), (d) and (f) are addressed by the requirements of Conditions 7.1.5(b) through (f) and the records required in Condition 7.1.9(a) through (c) and (i).
- b. Compliance with the PM emission limitation of Condition 7.1.3(e) is not required to be addressed because the units are considered to be insignificant emitters of PM (less than 0.1 lb/hr and the allowable under the rule would be a minimum of 0.55 lb/hr).
- c. Compliance with the VOM and HAP emission limitations of Conditions 7.1.5(a) are addressed by the requirements of Conditions 7.1.5(c), (d) and (e) and the records required in Conditions 7.1.9(a)-(c) and (h)-(j).

d. Compliance with the VOM emission limitations of Conditions 7.1.6(a) and (b) are addressed by the requirements of Conditions 7.1.5(a)-(e), the testing requirements in Condition 7.1.7(a), the monitoring requirements in Conditions 7.1.8(a)-(d), and the records required in Condition 7.1.9.

e.
$$\text{VOM Emissions} = \frac{\text{Material}^*}{\text{Material}^*} \times \frac{\text{VOM Content}}{\text{of Material}^*} \times (1 - \text{CE}) - \frac{\text{Amount of VOM}}{\text{in Waste Material}}$$

* Coating, ink, laminating or adhesive solvent

Where:

CE = Overall Control Efficiency of the emissions control system

f. Emissions from the thermal oxidizers burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10⁶ ft³)</u>
NO _x	100.0
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small industrial boilers (< 100 mmBtu/hr), Tables 1.4.1 and 1.4.2, AP-42, Volume I, 5th Edition, March 1998 Revision.

Oxidizer Emissions (lb) = Natural Gas Consumed Multiplied by the Appropriate Emission Factor.

7.2 Fixed Roof Storage Tank

7.2.1 Description

The Permittee utilizes one underground storage tank for the bulk storage of toluene or toluene-based material. Permanent submerged loading must be used on this tank, minimizing turbulence and evaporation of VOM during loading.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Storage Tank	Description	Date of Construction	Emission Control Equipment
UST 2	4,000 Gallon Fixed Roof Tank Used for Storing Toluene or Toluene-Based Material	Pre-1985	Permanent Submerged Loading Pipe

7.2.3 Applicable Provisions and Regulations

- a. The "affected storage tank" for the purpose of these unit-specific conditions, is a storage tank described in Conditions 7.1.1 and 7.1.2.
- b. The affected storage tank is a storage tank that is only subject to 35 IAC 218.122(b). A storage tank is subject to the requirements of 35 IAC 218.122(b) if the tank has a capacity greater than 250 gallons and is used to store an organic material with a vapor pressure of 2.5 psia or greater at 70°F.

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected storage tank is not subject 35 IAC 218.986(a), pursuant to the exemptions outlined in 35 IAC 218.980(a), i.e., the affected storage tanks are regulated in Subpart B of 35 IAC Part 218.
- b. The affected storage tank is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected storage does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels and it uses inherent process equipment that is not considered a control device because the equipment prevents the formation of emissions.

7.2.5 Control Requirements and Work Practices

Each affected tank shall be equipped and operated with a permanent submerged loading pipe, pursuant to 35 IAC 218.122(b). (The Illinois EPA has not approved use of other equivalent equipment in lieu of a permanent submerged loading pipe.)

7.2.6 Production and Emission Limitations

Production and emission limitations are not set for the affected storage tank. However, there are source-wide production and emission limitations set forth in Condition 5.6.

7.2.7 Testing Requirements

Testing requirements are not set for the affected storage tank. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.2.8 Monitoring Requirements

Monitoring requirements are not set for the affected storage tank. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected storage tank to demonstrate compliance with Conditions 5.6.1 and 7.2.3 and 7.2.5, pursuant to Section 39.5(7) (b) of the Act:

a. Tanks Information

- i. Design information for the tank showing the presence of a permanent submerged loading pipe; and
- ii. Maintenance and repair records for the tank, as related to the repair or replacement of the loading pipe.

b. Contents and Emission Information

- i. The throughput of each organic liquid through each affected tank (monthly);
- ii. The volatile organic material (VOM) emissions attributable to each organic liquid stored at the source, tons/month, with supporting calculations, calculated utilizing an approved USEPA methodology, such as the TANKS program; and
- iii. Total emissions of each individual HAP, and combined HAPs, tons/month, with supporting calculations.

7.2.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected storage tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the event, the probable cause of such deviations, and any corrective actions and preventive measures taken:

Any storage of VOL in an affected tank that deviates from the control requirements due to the absence of the features required by Condition 7.3.5, e.g., no "permanent submerged loading pipe," within five days of becoming aware of the deviation.

- b. Report any other deviations of this permit within 30 days.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected storage tank. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.1.12 Compliance Procedures

- a. Compliance with Condition 7.2.3(b) is addressed by the records required in Condition 7.2.9(a).
- b. For the purpose of estimating VOM emissions from the storage tanks, the current version of the TANKS program is acceptable.

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 _____ (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 that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

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

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit.

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 Conditions 8.6.3 and 8.6.4.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;
- e. The test method(s) that 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. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

- i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency
Bureau of Air
Compliance & Enforcement Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
Bureau of Air
Air Quality Planning Section (MC 39)
P.O. Box 19276
Springfield, Illinois 62794-9276

- iii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iv. USEPA Region 5 - Air Branch

USEPA (A - 18J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

- 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, pursuant to Section 39.5(7)(j) and (p) of the Act, 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, or 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 this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [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 there under.

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 as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (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 applicable requirements; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any regulated activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. At 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 including any logs, plans, procedures, or instructions required to be kept 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, Air Quality Planning Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7) (p) (v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Unit, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was

continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act and applicable regulations [Section 39.5(7) (p) (i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 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 [Section 39.5(7) (k) of the Act]:

- 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.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7) (k) (iv) of the Act.

- 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 [Section 39.5(7)(k)(iv) of the Act].

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, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, 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 that inaccurate statements were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

- d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

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 and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) 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. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and 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

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

10.0 ATTACHMENTS

Attachment 1 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

- a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].
- 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 which, 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. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

where:

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

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

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

B. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

iii. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

b. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322].

- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units 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. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

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

where:

P = Process weight rate; and

E = Allowable emission rate; and,

- A. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

- B. For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

iii. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric		English	
P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>T/hr</u>	<u>lb/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

www.epa.state.il.us/air/caapp/199-caapp.pdf

www.epa.state.il.us/air/permits/197-fee.pdf

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