

FINAL DRAFT/PROPOSED CAAPP PERMIT
Quebecor Printing Mt. Morris, Inc.
I.D. No.: 141035AAA
Application No.: 95080108
September 17, 2003

217/782-2113

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

PERMITTEE

Quebecor Printing Mt. Morris, Inc.
Attn: Robert Carpenter
404 North Wesley Avenue
Mt. Morris, Illinois 61054

<u>Application No.:</u> 95080108	<u>I.D. No.:</u> 141035AAA
<u>Applicant's Designation:</u>	<u>Date Received:</u> August 23, 1995
<u>Operation of:</u> Printing Facility	
<u>Date Issued:</u> !TO BE DETERMINED!	<u>Expiration Date</u> ² : !DATE!
<u>Source Location:</u> 404 North Wesley Avenue, Mt. Morris, IL, Ogle County	
<u>Responsible Official:</u> James Riffe, Vice President and General Manager	

This permit is hereby granted to the above-designated Permittee to OPERATE a printing facility, 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 David Hulskotter at 217/782-2113.

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

DES:DWH:psj

cc: Illinois EPA, FOS, Region 2
CES
Lotus Notes

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

2 Except as provided in Condition 8.7 of this permit.

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	6
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	8
5.0 OVERALL SOURCE CONDITIONS	10
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 NOT APPLICABLE TO THIS PERMIT	16
7.0 UNIT SPECIFIC CONDITIONS	17
7.1 Rotogravure Printing Presses	
7.2 Lithographic Offset Printing Presses	
7.3 Paper Cutting and Shredding Operations	
7.4 Gas Fired Boilers	
7.5 Cleaning Tanks	
7.6 Flexographic Platemaker	
7.7 Perfect Binder Hot Melt Gluer	
7.8 Ink Jetting	
7.9 Chromium Electroplating	

1.0 SOURCE IDENTIFICATION

1.1 Source

Quebecor Printing Mt. Morris, Inc.
404 North Wesley Avenue
Mt. Morris, Illinois 61054
815/734-4121

I.D. No.: 141035AAA
Standard Industrial Classification: 2752, Printing and Publishing

1.2 Owner/Parent Company

Quebecor Printing Mt. Morris, Inc.
404 North Wesley Avenue
Mt. Morris, Illinois 61054

1.3 Operator

Quebecor Printing Mt. Morris, Inc.
404 North Wesley Avenue
Mt. Morris, Illinois 61054

Robert Carpenter/Environmental Coordinator
815/734-4121

1.4 General Source Description

Quebecor Printing is located at 404 North Wesley Avenue in Mt. Morris. Quebecor Printing is a commercial printer providing, binding and mailing services to the publish industry. The primary products manufactured at this site include, but are not limited to, magazines, catalogs, newspaper inserts, tabloid magazines, and retail and wholesale advertising circulars.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
hr	hour
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
kW	kilowatts
lb	pound
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
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 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:

Electrolytic Dechroming
Shallow Tray Air Stripper
Above Ground Storage Tanks

- 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:

Re-Etch Tanks
Copper Plating Units
Electrolytic Degreasing (Sodium Hydroxide and Water)
Scrap Paper Balers

- 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:

- a. 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)].
- b. Equipment used for the melting or application of less than 50,000 lbs/year of wax to which no organic solvent has been added [35 IAC 201.210(a)(7)].

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

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 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 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. 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.
- 3.2.3 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 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

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
RP5	Rotogravure Printing Press #5	1962	Carbon Adsorption System
RP6	Rotogravure Printing Press #6	1967	Carbon Adsorption System
RP9	Rotogravure Printing Press #9	1987	Carbon Adsorption System
RP10	Rotogravure Printing Press #10	1990	Carbon Adsorption System
RP11	Rotogravure Printing Press #11	1992	Carbon Adsorption System
RP12	Rotogravure Printing Press #12	1996	New Carbon Adsorption System
PP1	Rotogravure Proof Press #1	1990	Carbon Adsorption System
PP7	Rotogravure Proof Press #7	1961	Carbon Adsorption System
CW1	Cylinder Wash Tank	1990	Carbon Adsorption System
OP2	Lithographic Offset Printing Press #2	1989	Thermal Regenerative Oxidizer
OP4	Lithographic Offset Printing Press #4	1989	Thermal Regenerative Oxidizer
OP5	Lithographic Offset Printing Press #5	1989	Thermal Regenerative Oxidizer
PC1	Paper Cutting Operations #1	1968	Cyclone #1
PC2	Paper Cutting Operations #2	1987	Cyclone #2
PS1	Paper Shredding Operations #1	1960	Cyclone #3
PS2	Paper Shredding Operations #2	1986	Gruendler Filter/Collection System
BO2	Boiler #2 16.7 mmBtu/hr	1958	None
BO3	Boiler #3 16.7 mmBtu/hr	1958	None
BO4	Boiler #4 16.7 mmBtu/hr	1974	None
BO5	Boiler #5 20.35 mmBtu/hr	1974	None
BO6	Boiler #6 20.35 mmBtu/hr	1991	None
CT1	Cleaning Tank #1	1995	None

FINAL DRAFT/PROPOSED CAAPP PERMIT
 Quebecor Printing Mt. Morris, Inc.
 I.D. No.: 141035AAA
 Application No.: 95080108
 September 17, 2003

Emission Unit	Description	Date Constructed	Emission Control Equipment
CT2	Cleaning Tank #2	1995	None
CT3	Cleaning Tank #3	1993	None
CT4	Cleaning Tank #4	1990	None
FP1	Flexographic Platemaker with Distiller	1992	None
HM1	Perfect Binder Hot Melt Gluer #1	1986	None
IJ1	Ink Jetting Units	1983-1997	None
ET1	Chromium Electroplating Tank #1	1990	Multiple Stage Composite Mesh Pad Demister #1
ET2	Chromium Electroplating Tank #2	1992	Multiple Stage Composite Mesh Pad Demister #2

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.2 Applicable Regulations

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

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

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

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

- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 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.

5.2.4 Risk Management Plan

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

- 5.2.5
- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC 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 40 CFR Part 70 or 71.
 - 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 requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

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

5.2.7 CAM Plan

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

the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	2,662.22
Sulfur Dioxide (SO ₂)	----
Particulate Matter (PM)	67.12
Nitrogen Oxides (NO _x)	54.58
HAP, not included in VOM or PM	0.01
TOTAL	2,783.93

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

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

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit, including HAP emissions.

5.6.6 Retention and Availability of Records

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of 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.

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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

FINAL DRAFT/PROPOSED CAAPP PERMIT
Quebecor Printing Mt. Morris, Inc.
I.D. No.: 141035AAA
Application No.: 95080108
September 17, 2003

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Rotogravure Printing Presses

7.1.1 Description

These printing presses are doing publication rotogravure printing. Publication rotogravure is applicable for relatively long press runs and most suitable for publications printed on uncoated paper stock, commonly referred to as newsprint. The items produced on the rotogravure printing presses at this source are catalogs, magazines, newspapers, inserts and commercial printing. In the cylinder wash tank ink and grease is cleaned from the gravure design cylinders. All the equipment listed in 7.1.2 is controlled by the carbon adsorption system.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
RP5	Rotogravure Printing Press #5	Carbon Adsorption System
RP6	Rotogravure Printing Press #6	Carbon Adsorption System
RP9	Rotogravure Printing Press #9	Carbon Adsorption System
RP10	Rotogravure Printing Press #10	Carbon Adsorption System
RP11	Rotogravure Printing Press #11	Carbon Adsorption System
RP12	Rotogravure Printing Press #12	New Carbon Adsorption System
PP1	Rotogravure Proof Press #1	Carbon Adsorption System
PP7	Rotogravure Proof Press #7	Carbon Adsorption System
CW1	Cylinder Wash Tank	Carbon Adsorption System

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected emission units" for the purpose of these unit-specific conditions, are the emission units listed in Condition 7.1.2.
- b. Each affected emission unit is subject to the emission limits identified in Condition 5.2.2.

- c. The rotogravure printing presses are subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subparts A and KK and the New Source Performance Standards (NSPS) for Publication Rotogravure Printing, 40 CFR 60 Subparts A and QQ. The Illinois EPA is administering NESHAP and NSPS in Illinois on behalf of the USEPA under a delegation agreement.
- i. Each publication rotogravure affected source shall limit emissions of organic HAP to no more than eight percent of the total volatile matter used each month. The emission limitation may be achieved by overall control of at least 92 percent of organic HAP used, by substitution of non-HAP materials for organic HAP, or by a combination of capture and control technologies and substitution of materials [40 CFR 63.824(b)].
- ii. The owner or operator is subject to 40 CFR 60.432 NSPS Publication Rotogravure Printing standards for volatile organic compounds. These standards require 84% control of VOC.
- Condition 7.1.5 is more stringent than this requirement therefore compliance with Condition 7.1.5 assures compliance with 40 CFR 60.432.
- iii. No owner or operator of a publication rotogravure printing press and employing solvent-containing ink may cause or allow the operation of such press unless:
- The owner or operator installs and operates a carbon adsorption system which reduces the volatile organic emissions from the capture system by at least 90 percent by weight and an overall reduction in volatile organic material emissions of at least 75 percent [35 IAC 215.401].
- Condition 7.1.5 is more stringent than this requirement therefore compliance with Condition 7.1.5 assures compliance with 35 IAC 215.401.

7.1.4 Non-Applicability of Regulations of Concern

- a. The rotogravure printing presses are not subject to 35 IAC 215.301, Use of Organic Material, because 35 IAC 215.403 exempts emission units that comply with 35 IAC 215 Subpart P, Printing and Publishing.
- b. The New Source Performance Standards for Publication Rotogravure Printing, 40 CFR 60 Subpart QQ does not apply to rotogravure printing presses numbers 5, 6 and 7 because these presses were constructed prior to October 28, 1980, the applicability date for this NSPS.
- c. This permit is issued based on the affected emission units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected emission units are subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

7.1.5 Operational and Production Limits and Work Practices

- a.
 - i. Volatile organic compound (VOC) emissions from rotogravure press 12 shall be controlled by at least 97%. Compliance shall be demonstrated by a Permanent Total Enclosure (PTE) meeting 100% capture, and continuous monitors on the inlet and outlet of the adsorption system meeting a minimum 97% removal efficiency, across a 24-hour average of at least hourly measurements of inlet VOC and outlet VOC, as determined by monitoring in accordance with Condition 7.1.8.
 - ii. VOM emissions generated by Press 12 will exhaust to the new carbon adsorption system exclusively, except during emergency or breakdown circumstances during which time the exhaust shall be routed to the existing carbon adsorption system.
 - iii. During emergency or breakdown circumstances, Press 12 shall not exhaust to the existing carbon adsorption system for periods exceeding 72 hours. If the emergency or breakdown circumstance exceeds 72 hours, Permittee shall notify the Illinois EPA and seek authority to

exhaust Press 12 emissions to the existing carbon adsorption system for more than 72 hours.

- b. The carbon adsorption system for rotogravure printing presses, in conjunction with the capture systems, shall achieve at least 92% overall control of emissions of VOC from all rotogravure presses at the plant. That is, no more than 8% of the mass of VOC solvent used on the presses shall be discharged to the atmosphere. Compliance shall be determined according to the methodology of New Source Performance Standard, 40 CFR 60.433 using a monthly time period and such other adjustments authorized by the Illinois EPA. The use of this methodology does not indicate that all existing presses are subject to 40 CFR 60, Subpart QQ.

The above limitations were established in Permit 95080142, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not cause or contribute to air pollution in violation of the National Ambient Air Quality Standard (NAAQS) for ozone pursuant to Title 1 of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

- c. At all times, the Permittee shall also maintain and operate the rotogravure presses, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
- d. The solvent usage from the cylinder washing machine with distiller is to be controlled by the common vapor recovery system.

7.1.6 Emission Limitations

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

- a. Operation and emissions of all rotogravure printing operations, including proof presses, shall not exceed the following limits:

FINAL DRAFT/PROPOSED CAAPP PERMIT
 Quebecor Printing Mt. Morris, Inc.
 I.D. No.: 141035AAA
 Application No.: 95080108
 September 17, 2003

Total Monthly Ink Usage <u>(Tons/Month)</u>	Total Monthly VOM Ink Solvent Usage <u>(Tons/Month)</u>	Total Annual VOM Emissions <u>(Tons/Year)</u>
1,285	935.5	1,570

Compliance with annual VOC solvent usage and emission limits shall be determined from a running 12 months of data.

The above limitations were established in Permit 74100089, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

- b. Operation and emissions of Rotogravure Press 11 shall not exceed the following limits:

Monthly Ink Usage <u>(Tons/Month)</u>	Monthly VOM Ink Solvent Usage* <u>(Tons/Month)</u>	Annual VOM Emissions <u>(Tons/Year)</u>
440	320	530

* VOM Ink Solvent Usage refers to the amount of VOM in ink as delivered to rotogravure presses, including thinning solvents and ink extender.

Compliance with annual VOC solvent usage and emission limits shall be determined from a running 12 months of data.

The above limitations were established in Permit 91010065 (this was a construction permit with a netting project), pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

- c. Operation and emissions of Press 12 shall not exceed the following limits:

<u>Monthly VOC Solvent Usage</u> <u>(Tons/Mo*)</u>	<u>(Tons/Yr)</u>	<u>VOC Emissions</u> <u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
950	11,400	47.5	570

* VOC Solvent Usage refers to the amount of VOC in ink as delivered to rotogravure presses, plus any thinning solvent and any VOC in ink extender and cleaning material.

Compliance with annual VOC solvent usage and emission limits shall be determined from a running total of 12 months of data.

The above limitations were established in Permit 95080142, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not cause or contribute to air pollution in violation of the National Ambient Air Quality Standard (NAAQS) for ozone pursuant to Title 1 of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.1.7 Testing Requirements

- a. The owner or operator shall perform applicable testing for the rotogravure printing presses as specified by 40 CFR 63.827 Performance Test Methods and 40 CFR 60.435.
- b. Testing of VOC containing materials such as inks and coatings may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the owner or operator and the owner's or operator's records directly reflect the application of such material and separately account for any additions of solvent.

7.1.8 Monitoring Requirements

- a. i. A continuous monitoring system shall be operated, maintained and calibrated for VOC

concentration in the exhaust for the carbon adsorption system to verify proper operation of the system.

- ii. This monitoring system shall monitor and record the VOM concentration during the period prior to commencing each regeneration of the carbon beds (to assure that "breakthrough" is not reached) and during a period at the beginning of adsorption (to assure that the bed has been regenerated).
 - iii. A continuous monitoring system shall be installed, operated, maintained and calibrated for VOC in the inlet and outlet from the carbon adsorption system controlling emissions from Press 12.
 - iv. This monitoring system shall monitor and record the VOC concentration and air flow, so as to determine the mass of VOC in the inlet and outlet of the carbon adsorption system.
- b. The continuous monitoring systems shall be operated in accordance with the monitoring plan, as approved by the Illinois EPA.
- i. The Permittee shall inspect the carbon adsorption systems, including observing the stack exhausts during various phases of the operation of each carbon bed, on a regular schedule.
 - ii. The Permittee shall conduct routine maintenance of the carbon adsorption systems in accordance with a written maintenance plan, which plan shall be kept current.
- c. The owner or operator is also subject to any remaining monitoring requirements in 40 CFR 63.828 and 40 CFR 60.434 that are not covered by the above conditions.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected emission units to demonstrate compliance

with the permit conditions, pursuant to Section 39.5(7) (b) of the Act:

- a. The owner or operator shall retain the applicable records for the rotogravure printing presses as specified by 40 CFR 63.829 and 40 CFR 60.434.
- b. The use of ink and other materials for the affected emission units, so as to enable organic material emissions from individual emission units and compliance with Condition 7.1.6. These records shall be compiled on at least a monthly basis.
- c. Monthly records for VOM solvent use and recovery for the affected emission units to allow compliance with Conditions 7.1.3 and 7.1.5 to be determined.
- d. VOM contents of materials used.
- e. Monthly and annual VOM emissions, in tons.
- f. All breakdown and emergency circumstances requiring the re-routing of Press 12 exhaust to the existing carbon adsorption system shall be entered in a logbook and available to the Illinois EPA for inspection.

7.1.10 Reporting Requirements

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

- a. The owner or operator shall submit all applicable reports for the rotogravure printing lines as specified in 40 CFR 63.830.
- b. Emissions of VOM in excess of the limits in Condition 7.1.6 within 30 days of a record showing such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The owner or operator is authorized to modify, change and otherwise alter any and all raw material formulas, characteristics and usage rates for the affected emission

units provided these changes comply with the permit conditions. This condition does not affect the owner or operator'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:

7.1.12 Compliance Procedures

- a. Compliance with air pollution control efficiency requirements shall be determined according to the methodologies of 40 CFR 60.433 and 40 CFR 63.824.
- b. VOM emissions may be determined using the emission formula listed below:

$$\begin{array}{l} \text{VOM Emissions} \\ \text{from Ink, Coating} \\ \text{\& Solvent Usage} \end{array} = \begin{array}{l} \text{Material} \\ \text{Usage} \end{array} \times \begin{array}{l} \text{VOM} \\ \text{Content} \end{array} \times \left(1 - \begin{array}{l} \text{Overall Control} \\ \text{Efficiency} \end{array} \right)$$

7.2 Lithographic Offset Printing Presses

7.2.1 Description

These printing presses are doing heatset offset lithography printing. Heatset offset lithography is typically the process of choice for high-quality publications when the run length is either "short" or "medium". The items produced on the lithographic printing presses at this source are magazines, catalogs, newspaper inserts and commercial printing.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
OP2	Lithographic Offset Printing Press #2	Thermal Regenerative Oxidizer
OP4	Lithographic Offset Printing Press #4	Thermal Regenerative Oxidizer
OP5	Lithographic Offset Printing Press #5	Thermal Regenerative Oxidizer

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected lithographic presses" for the purpose of these unit-specific conditions, are the lithographic presses listed in Condition 7.2.2.
- b. The affected lithographic presses are subject to the emission limits identified in Condition 5.2.2.
- c. The owner or operator may not cause or allow the operation of any heatest web offset press unless the fountain solution contains no more than eight (8) percent, by weight, of VOM [35 IAC 215.408(b)].
- d. Operation in excess of the applicable emission standards during malfunction and breakdown is allowed. This allowance applies only to the following specific equipment: the lithographic presses.
- e. The owner or operator shall notify the Illinois EPA's regional office by telephone as soon as possible during normal working hours upon the occurrence of excess emissions due to malfunctions, or breakdowns (excluding minor occurrences lasting less than 1 hour). The owner or operator shall comply with all

reasonable and safe directives of the regional office regarding such malfunctions and breakdowns. Within five (5) working days of such occurrence the owner or operator shall give a written follow-up notice to the Illinois EPA's regional office providing an explanation of the occurrence, including work performed, the length of time during which operation continued under such conditions, measures taken by the owner or operator to minimize excess emissions and correct deficiencies, and when normal operation resumed.

7.2.4 Non-Applicability of Regulations of Concern

- a. The 8 pounds per hour organic material emission limitation of 35 IAC 215.301 does not apply to the affected lithographic presses because 35 IAC 215.403 exempts printing presses in compliance with 35 IAC 215 Subpart P: Printing and Publishing.

7.2.5 Operational and Production Limits and Work Practices

- a.
 - i. Except as provided in Condition 7.2.3, the affected lithographic presses shall only be operated when the thermal regenerative oxidizer is in operation. The thermal regenerative oxidizer shall be operated between November 1 of any year and March 31 of the following year, notwithstanding 35 IAC 215.106.
 - ii. The thermal regenerative oxidizer controlling the affected lithographic presses shall be operated to achieve an overall control of 90% or better for volatile organic material (VOM) emissions.
- b. The thermal regenerative oxidizer shall be preheated to 1400°F prior to the introduction of any VOM emissions, and it shall be maintained at 1400°F whenever VOM emissions are being introduced, this shall be checked hourly.
- c. Natural gas shall be the only fuel burned in the thermal regenerative oxidizer.

7.2.6 Emission Limitations

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

- a. Operation and emissions of the affected lithographic presses as a group, shall not exceed the following limits:

Maximum Ink Usage <u>(Lb/Hour)</u>	Annual Ink Usage <u>(Tons/Year)</u>	Annual VOM Emissions <u>(Tons/Year)</u>
570	1,007	39.5

- b.
 - i. The VOM content of the inks used on the affected lithographic presses shall not exceed 49% by weight.
 - ii. The VOM content of the damping or fountain solution used on these presses shall be negligible.
- c. The above limitations were established in Permit 74100089, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.2.7 Testing Requirements

- a. Emission testing pursuant to 35 IAC 215.410.
 - i. Any required tests of volatile organic material emissions, including tests conducted to determine control equipment efficiency, shall be conducted in accordance with the methods and procedures specified in Section 215.102.
 - ii. Upon a reasonable request by the Illinois EPA, the owner or operator of a volatile organic material emission source required to comply with the limits of this Subpart shall conduct

emissions testing, at his own expense, to demonstrate compliance.

iii. A person planning to conduct a volatile organic material emissions test to demonstrate compliance with this permit shall notify the Illinois EPA of that intent not less than 30 days before the planned initiation of the tests so the Illinois EPA may observe the test.

b. Testing methods for volatile organic material content

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

7.2.8 Monitoring Requirements

The thermal oxidizer shall be equipped with a continuous temperature indicator for the thermal oxidizer combustion chamber temperature.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the owner or operator shall maintain records of the following items for the affected lithographic presses to demonstrate compliance with the permit conditions, pursuant to Section 39.5(7)(b) of the Act:

- a. Usage of ink, fountain solution, coating and blanket wash in tons per month.
- b. The VOM content (VOM weight %) of the ink, fountain solution, coating and blanket wash used with basis, accompanied by a copy of the supporting information, e.g., supplier data sheet or laboratory analysis report.
- c. VOM emissions per month in tons.
- d. Daily log stating if thermal oxidizer was operated at the required temperature. The log shall include:

- i. Dates and duration of presses in operation when oxidizer temperature was below 1400°F.
 - ii. Combustion chamber temperatures below 1400°F listed next to the dates in Condition 7.2.9(d) (i).
- e. Malfunction and breakdown records, as a minimum these records shall include:
- i. Date and duration of malfunction or breakdown;
 - ii. A full and detailed explanation of the cause for such emissions;
 - iii. The contaminants emitted and an estimate of the quantity of emissions;
 - iv. The measures used to reduce the quantity of emissions and the duration of the occurrence; and
 - v. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity.

7.2.10 Reporting Requirements

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

- a. Emissions of VOM in excess of the limits in Condition 7.2.6 within 30 days of a record showing such an occurrence.
- b. Any usage of fountain solution that contains more than 8 percent, by weight of VOM within 30 days of a record showing such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The owner or operator is authorized to modify, change and otherwise alter any and all raw material formulas, characteristics and usage rates for the affected

lithographic printing presses. This condition does not affect the owner or operator'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.

7.2.12 Compliance Procedures

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

Ink VOM Emissions (E_I):

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

Fountain Solution VOM Emissions (E_F):

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

Automatic Blanket Wash VOM Emissions (E_A):

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

Manual Blanket Wash VOM Emissions (E_M)

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

Total VOM Emissions (E_T):

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

Where:

C_I = Ink VOM consumption (tons)

C_F = Fountain solution VOM consumption (tons)

C_A = Automatic blanket wash VOM consumption (tons)

C_M = Manual blanket wash VOM consumption (tons)

R_M = Retention factor for manual blanket wash
= 50%, for manual blanket wash with a VOM composite partial vapor pressure less than 10 mmHg at 20°C and the used cleaning towels are kept in closed containers.

= 0% for other manual blanket wash

- R_I = Percent of ink VOM retained in printed product
 (non-heatset = 95%, heatset = 20%)
- K = Control efficiency of afterburner (non-heatset = 0%, heatset = 90% when afterburner is operating)
- J_I = Capture efficiency of dryer and control system for ink VOM (non-heatset = 0%, heatset = 100%)
- J_F = Capture efficiency of dryer and control system for fountain solution (non-heatset = 0%, heatset = 70%)
- J_A = Capture efficiency of dryer and control system for automatic blanket wash VOM (non-heatset = 0%, heatset = 40% when a blanket wash with a vapor pressure less than 10 mmHg at 20°C is used, otherwise capture efficiency = 0%)

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

Natural Gas
 Emission Factors
 for Boilers
(lb/10⁶ ft³)

1. Pollutant

NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5

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

Emissions (lb) = (Natural Gas Consumed, ft³) x (The Appropriate Emission Factor)

7.3 Paper Cutting and Shredding Operations

7.3.1 Description

Paper is trimmed and shredded. Cyclones and a filter/collection system control the particulate matter emissions from the cutting and shredding operations.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
PC1	Paper Cutting Operations #1	Cyclone #1
PC2	Paper Cutting Operations #2	Cyclone #2
PS1	Paper Shredding Operations #1	Cyclone #3
PS2	Paper Shredding Operations #2	Gruendler Filter/Collection System

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected paper cutting operations" for the purpose of these unit-specific conditions, are the paper cutting operations listed in Condition 7.3.2.
- b. Paper cutting operations #1 and paper shredding operations #1 are subject to the 35 IAC 212.322, which provides that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process 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 by the following equation:

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

Where:

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

For 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	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0.00	0.00

- c. The emissions of particulate matter into the atmosphere in any one hour period from the paper cutting operations #2 and paper shredding operations #2 shall not exceed the allowable emission rates specified by the following equation [35 IAC 212.321]:

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

Where:

P = Process weight rate; and

E = Allowable emission rate; and,

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

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

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

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

Where:

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

E = Allowable emission rate in kilograms or
pounds per hour.

7.3.4 Non-Applicability of Regulations of Concern

N/A

7.3.5 Operational and Production Limits and Work Practices

The owner or operator shall follow good operating practices for the emission control equipment including periodic inspection, routine maintenance, repair of defects and visual emission checks.

7.3.6 Emission Limitations

N/A

7.3.7 Testing Requirements

N/A

7.3.8 Monitoring Requirements

N/A

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected paper cutting operations to demonstrate compliance with Conditions of this permit, pursuant to Section 39.5(7) (b) of the Act:

- a. Records of waste produced on a monthly basis in tons.
- b. A maintenance log for the emission control equipment detailing all routine and nonroutine maintenance performed.
- c. Annual PM emissions.

7.3.10 Reporting Requirements

The owner or operator shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected

cutting operations 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.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The owner or operator is authorized to modify the process weight rate for the paper cutting operations. 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.

7.3.12 Compliance Procedures

- a. Compliance with the PM limitations of Condition 7.3.3 is demonstrated by proper operation of the affected paper cutting operations and associated emission control equipment including performance of the operational and work practice requirements of Condition 7.3.5 and recordkeeping requirements of Condition 7.3.9.
- b. Particulate matter emissions for the affected paper cutting operations may be estimated using the equations in Conditions 7.3.3(b) and (c).

7.4 Gas Fired Boilers

7.4.1 Description

Natural gas fired boilers are used for steam generation/heat generation.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
BO2	Boiler #2	16.7 mmBtu/hr
BO3	Boiler #3	16.7 mmBtu/hr
BO4	Boiler #4	16.7 mmBtu/hr
BO5	Boiler #5	20.35 mmBtu/hr
BO6	Boiler #6	20.35 mmBtu/hr

7.4.3 Applicability Provisions and Applicable Regulations

- a. The "affected boilers" for the purpose of these unit-specific conditions, are the emission units listed in Condition 7.4.2.
- b. Each affected boiler is subject to the emission limits identified in Condition 5.2.2.
- c. Boiler #6 is subject to a New Source Performance Standard (NSPS) for small Industrial, Commercial, and Industrial Steam Generating Units, 40 CFR 60, Subparts A and Dc. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
 - i. Pursuant to the New Source Performance Standard, the emission of gases into the atmosphere from Boiler #6, except during periods of startup, malfunction and shutdown, shall not exhibit an opacity greater than 20 percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity [40 CFR 60.43c(c) and (d)].
- d. The emission of carbon monoxide (CO) into the atmosphere from any affected boiler with actual heat input greater than 2.9 MW (10 MBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.4.4 Non-Applicability of Regulations of Concern

- a. The New Source Performance Standard for Small - Industrial - Commercial - Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc, applies to units constructed, reconstructed, or modified after June 9, 1989. Boilers 2, 3, 4 and 5 were constructed prior to this date, therefore 40 CFR 60, Subpart Dc is not applicable for these boilers.
- b. Each affected boiler is not subject to 35 IAC 217.141, because the actual heat input of the affected boilers is less than 73.2 MW (250 MBtu/hr).
- c. Pursuant to 35 IAC 215.303, each affected boiler, i.e., fuel combustion emission unit, is not subject to 35 IAC 215.301, Use of Organic Material.

7.4.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel burned in the boilers.

7.4.6 Emission Limitations

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

Emissions and operation of boiler #6 shall not exceed the following limits:

<u>Firing Rate</u> <u>(Million Btu/Hr)</u>	<u>Nitrogen Oxides</u> <u>(Lb/Hr)</u>	<u>(Ton/Yr)</u>	<u>Carbon Monoxide</u> <u>(Lb/Hr)</u>	<u>(Ton/Yr)</u>
20.35	2.85	12.5	0.71	3.1

These limits are based on standard emission factors, the maximum firing rate, and maximum hours of operation, as indicated in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

The above limitations were established in Permit 74100089, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the

CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

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

- a. Total natural gas usage for the boilers (cubic feet/month and per year).
- b. Monthly and annual aggregate NO_x, PM, SO₂, and VOM emissions from the boilers, based on natural gas consumption and the applicable emission factors, with supporting calculations.

7.4.10 Reporting Requirements

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

- a. Notification within 60 days of operation of an affected boiler that may not have been in compliance with the opacity limitations of the Permit.
- b. Emissions of NO_x, PM, SO₂, or VOM from the affected boilers in excess of the limits specified in Conditions 5.5.1 and 7.4.6 within 30 days of such an occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance provisions addressing Condition 7.1.3(d) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of natural gas fired boilers.
- b. Compliance with emission limits in Condition 5.5 shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

<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.

Boiler emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

7.5 Cleaning Tanks

7.5.1 Description

Wipe cleaning is being performed to clean gravure design cylinders.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
CT1	Cleaning Tank #1	None
CT2	Cleaning Tank #2	None
CT3	Cleaning Tank #3	None
CT4	Cleaning Tank #4	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. i. The "affected cleaning tanks" for the purpose of these unit-specific conditions, are the cleaning tanks listed in Condition 7.5.2.
- ii. The affected cleaning tanks are subject to the emission limits identified in Condition 5.2.2.
- b. The owner or operator shall not cause or allow the discharge of more than 3.6 Kg/hr (8 lbs/hr) of organic material into the atmosphere from an affected cleaning tank [35 IAC 215.301]. If no odor nuisance exists this limitation shall apply only to photochemically reactive material.

7.5.4 Non-Applicability of Regulations of Concern

N/A

7.5.5 Operational and Work Practices

Used cleaning towels shall be kept in closed containers.

7.5.6 Emission Limitations

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

N/A

7.5.7 Testing Requirements

Upon request by the Illinois EPA, the percent concentration of solvent in the VOM containing waste from the affected cleaning tanks shall be determined according to USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected plate washer to demonstrate compliance with the permit conditions, pursuant to Section 39.5(7)(b) of the Act:

- a. Annual pounds of cleaning compound used.
- b. VOM content of the cleaning compound.
- c. Annual pounds of waste solvent shipped offsite, if VOM emission credit is taken.
- d. VOM content of waste solvent shipped offsite, if VOM emission credit is taken.
- e. VOM emissions.

7.5.10 Reporting Requirements

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

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

- a. Compliance provisions addressing Condition 7.5.3(b) are not set by this permit as compliance is assumed

FINAL DRAFT/PROPOSED CAAPP PERMIT
Quebecor Printing Mt. Morris, Inc.
I.D. No.: 141035AAA
Application No.: 95080108
September 17, 2003

to be achieved by the normal work practices and maintenance activities inherent in operation of an affected cleaning tank.

- b. VOM emissions may be calculated using the emission formula listed below:

$$\begin{array}{l} \text{VOM Emissions} \\ \text{from Cleaning} \\ \text{Compound Usage (lb)} \end{array} = \begin{array}{l} \text{Cleaning} \\ \text{Compound} \\ \text{Usage (lb)} \end{array} \times \begin{array}{l} \text{Cleaning} \\ \text{Compound} \\ \text{VOM Content} \end{array}$$

7.6 Flexographic Platemaker

7.6.1 Description

Flexographic plates are manufactured by exposing the film on to a base material which becomes the image-bearing plate used to transfer ink to paper.

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
FP1	Flexographic Platemaker with Distiller	None

7.6.3 Applicability Provisions and Applicable Regulations

- a. The "affected emission unit" for the purpose of these unit-specific conditions, is the emission unit listed in Condition 7.6.2.
- b. The affected emission unit is subject to the emission limits identified in Condition 5.2.2.
- c. The owner or operator shall not cause or allow the discharge of more than 3.6 Kg/hr (8 lbs/hr) of organic material into the atmosphere from an affected emission unit [35 IAC 215.301]. If no odor nuisance exists this limitation shall apply only to photochemically reactive material.

7.6.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected emission unit not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected emission unit does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.6.5 Operational and Production Limits and Work Practices

N/A

7.6.6 Emission Limitations

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

Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Volatile Organic Material Emissions</u>	
	<u>(Lb/Hour)</u>	<u>(Tons/Year)</u>
Flexographic Platemaker	1.0	1.1
Distiller	1.0	1.0

Compliance with annual limits shall be determined from a running total of 12 months.

The above limitations were established in Permit 92030022, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.6.7 Testing Requirements

Upon request by the Illinois EPA, the percent concentration of solvent in the VOM containing waste from the affected emission unit shall be determined according to USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items to demonstrate compliance, pursuant to Section 39.5(7)(b) of the Act:

- a. Annual pounds of VOM containing material used.
- b. VOM contents of VOM containing materials used.
- c. Annual pounds of waste solvent shipped offsite, if VOM emission credit is taken.

- d. VOM content of waste solvent shipped offsite, if VOM emissions credit is taken.
- e. Monthly and annual VOM emissions.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected emission unit 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:

Emissions of VOM in excess of the limits in Condition 7.6.6 within 30 days of a record showing such an occurrence.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to change the chemicals being used in the platemaker, provided these changes comply with the permit conditions. 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.

7.6.12 Compliance Procedures

- a. Compliance provisions addressing Condition 7.6.3(c) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of an affected emission unit.
- b. VOM emissions may be calculated using the emission formula listed below:

VOM Emissions (lb) = Material Usage (lb) x VOM Content

7.7 Perfect Binder Hot Melt Gluer

7.7.1 Description

Publications bound by the perfect binding method are collated by laying individual sections on top of one another and then applying an adhesive to the backbone to form the final product.

7.7.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
HM1	Perfect Binder Hot Melt Gluer #1	None

7.7.3 Applicability Provisions and Applicable Regulations

- a. The "affected hot melt gluer" for the purpose of these unit-specific conditions, is the hot melt gluer listed in Condition 7.7.2.
- b. The owner or operator shall not cause or allow the discharge of more than 3.6 Kg/hr (8 lbs/hr) of organic material into the atmosphere from the affected hot melt gluer [35 IAC 215.301]. If no odor nuisance exists this limitation shall apply only to photochemically reactive material.
- c. The affected hot melt gluer is subject to the emission limits identified in Condition 5.2.2.

7.7.4 Non-Applicability of Regulations of Concern

The control requirements of 35 IAC 215 Subpart PP do not apply because the source is not located in one of the following counties: Cook, DuPage, Kane, Lake, Macoupin, Madison, McHenry, Monroe, St. Clair and Will.

7.7.5 Operational and Production Limits and Work Practices

N/A

7.7.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected hot melt gluer is subject to the following:

N/A

7.7.7 Testing Requirements

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

7.7.8 Monitoring Requirements

None

7.7.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected hot melt gluer to demonstrate compliance with the permit conditions, pursuant to Section 39.5(7)(b) of the Act:

- a. Monthly pounds of glue usage.
- b. VOM content of glue used.
- c. VOM emissions.

7.7.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected hot melt gluer 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.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to change the glue manufacturer, formulation and content, provided these changes comply with the permit conditions. 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.

7.7.12 Compliance Procedures

- a. Compliance provisions addressing Condition 7.7.3(b) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of the affected hot melt gluer.
- b. VOM emissions may be calculated using the emission formula listed below:

$$\text{VOM Emissions (lb)} = \text{Material Usage (lb)} \times \text{VOM Content}$$

7.8 Ink Jetting Units

7.8.1 Description

Ink jetting units are used for labeling. A number of ink jet units are used in the process.

7.8.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
IJ1	Ink Jetting Units	None

7.8.3 Applicability Provisions and Applicable Regulations

- a. The "affected ink jet operation" for the purpose of these unit-specific conditions, is the ink jet operation listed in Condition 7.8.2.
- b. The owner or operator shall not cause or allow the discharge of more than 3.6 Kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit [35 IAC 215.301]. If no odor nuisance exists this limitation shall apply only to photochemically reactive material.
- c. The affected ink jet operation is subject to the emission limits identified in Condition 5.2.2.

7.8.4 Non-Applicability of Regulations of Concern

N/A

7.8.5 Operational and Production Limits and Work Practices

N/A

7.8.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected ink jet operation is subject to the following:

N/A

7.8.7 Testing Requirements

Upon request by the Illinois EPA, the volatile organic material content of the inks shall be determined by Method

24, 40 CFR 60, Appendix A, incorporated by reference in
Section 215.105 [35 IAC 215.409].

7.8.8 Monitoring Requirements

None

7.8.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected ink jet operation to demonstrate compliance with the permit conditions, pursuant to Section 39.5(7) (b) of the Act:

- a. Monthly pounds of inks and ink related material usage.
- b. VOM content of inks and ink related material used.
- c. VOM emissions.

7.8.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected ink jetting operation 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.

7.8.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to change the ink manufacturer, formulation and content, and any other chemical used in such operation, provided these changes comply with the permit conditions. 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.

7.8.12 Compliance Procedures

- a. Compliance provisions addressing Condition 7.8.3(b) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of an affected ink jetting operation.

FINAL DRAFT/PROPOSED CAAPP PERMIT
Quebecor Printing Mt. Morris, Inc.
I.D. No.: 141035AAA
Application No.: 95080108
September 17, 2003

- b. VOM emissions may be calculated using the emission formula listed below:

VOM Emissions (lb) = Material Usage (lb) x VOM Content

7.9 Chromium Electroplating

7.9.1 Description

Two electroplating tanks are used for chromium plating of gravure design cylinders.

7.9.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
ET1	Chromium Electroplating Tank #1	Multiple Stage Composite Mesh Pad Demister #1
ET2	Chromium Electroplating Tank #2	Multiple Stage Composite Mesh Pad Demister #2

7.9.3 Applicability Provisions and Applicable Regulations

- a. Chrome Plating Tanks #1 and #2 are "affected plating tanks" for the purpose of these unit-specific conditions.
- b. Each affected plating tank is subject to the emission limits identified in Condition 5.2.2.
- c. The affected plating tanks are subject to the NESHAP for Chromium Emissions for Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, 40 CFR 63 Subparts A and N. The Illinois EPA is administering the NESHAP in Illinois on behalf of the USEPA under a delegation agreement. Because the affected plating tanks are used to apply a thick layer of chromium (typically 1.3 to 760 microns) which is electrodeposited on a base material to provide a surface with functional properties such as wear resistance, a low coefficient of friction, hardness, and corrosion resistance, they are considered to be hard chromium electroplating tanks and are subject to the following:

During tank operation, each owner or operator of an existing, new, or reconstructed affected source shall control chromium emissions discharged to the atmosphere from that affected source by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to

exceed 0.015 mg/dscm of total chromium of
 ventilation air (6.6×10^{-6} gr/dscf) [40 CFR
 63.342(c)(1)(i)].

- d. The affected plating tanks are subject to 35 IAC 212.321(a), which provides that:
 - i. NO person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
 - ii. The allowable emission rates of 35 IAC 212.321 may be calculated by the following equation:

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

Where:

P = process weight rate;
 E = allowable emission rate; and,

A. For process weight rates up to 408 mg/hr (450 T/hr):

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

7.9.4 Non-Applicability of Regulations of Concern

The affected plating tanks are not subject to 35 IAC 212.324, Process Emission Units in Certain Areas, because the source is not located in a non-attainment area for PM₁₀, as identified in 35 IAC 212.324(a)(1).

7.9.5 Operational and Production Limits and Work Practices

The operation and maintenance practices required by 40 CFR 63.342(f) shall be implemented, including:

- a. At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance plan required by 40 CFR 63.342(f) (3).
- b. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan required by 40 CFR 63.342(f) (3).
- c. A quarterly visual inspection of composite mesh pad (CMP) system to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the devices.
- d. A quarterly visual inspection of the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.
- e. A quarterly visual inspection of duct work from the tank(s) to the control device to ensure there are no leaks.
- f. Perform washdown of the composite mesh-pads in accordance with manufacturer's recommendations.
- g. The operation and maintenance plan shall specify procedures to follow to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.

7.9.6 Emission Limitations

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

N/A

7.9.7 Testing Requirements

The Permittee shall perform all applicable testing for the affected plating tanks and associated emission control equipment as specified by 40 CFR 63.344.

7.9.8 Monitoring Requirements

The Permittee shall perform all applicable monitoring for the affected plating tanks and associated emission control equipment as specified by 40 CFR 63.343 and 63.344, including:

Composite mesh-pad systems. (i) During the initial performance test, the owner or operator of an affected source, or a group of affected sources under common control, complying with the emission limitations in Section 63.342 through the use of a composite mesh-pad system shall determine the outlet **chromium** concentration using the test methods and procedures in Section 63.344(c), and shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in Section 63.344(d)(5). An owner or operator may conduct multiple performance tests to establish a range of compliance pressure drop values, or may set as the compliant value the average pressure drop measured over the three test runs of one performance test and accept [plusmn]1 inch of water column from this value as the compliant range [40 CFR 63.343(c)(1)].

7.9.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected emission units to demonstrate compliance, pursuant to Section 39.5(7)(b) of the Act:

The Permittee shall retain all the applicable records for the affected plating tanks as specified by 40 CFR 63.346.

7.9.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected plating tanks with the permit requirements as follows, pursuant to

Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. The Permittee shall submit all applicable reports for the affected plating tanks as specified in 40 CFR 63.347.

7.9.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.9.12 Compliance Procedures

- a. Compliance with Condition 7.9.3 for each affected plating tank is addressed by performance of the operational and work practices requirements of Condition 7.9.5, performance of monitoring requirements of Condition 7.9.8, performance of the testing required by Condition 7.9.7, and the recordkeeping required by Condition 7.9.9.
- b. Emissions may be calculated based on the following:

<u>Pollutant</u>	<u>Emission Factor (gr/dscf)</u>
Chromium	3.8×10^{-6}
PM	8.0×10^{-6}

These are the emission factors for hard chromium electroplating with composite mesh-pad mist eliminator, Table 12.20-1, AP-42, Volume I, Fifth Edition, Supplement D, July, 1996.

$$\text{Plating Emissions (lb/hr)} = (\text{Air Flow, cfm}) \times (\text{The Appropriate Emission Factor, gr/dscf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ min/hr})$$

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 _____ **{insert public notice start date}** (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)

EDIT ACCORDINGLY IF AN AFFECTED SOURCE, OTHERWISE USE THE FOLLOWING

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. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

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

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these

conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614
 - iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506
 - iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

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

FINAL DRAFT/PROPOSED CAAPP PERMIT
Quebecor Printing Mt. Morris, Inc.
I.D. No.: 141035AAA
Application No.: 95080108
September 17, 2003

I provisions until the Illinois EPA deletes or revises them in
accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or

resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for

continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
- i. An emergency occurred as provided in Section 39.5(7) (k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.2 Attachment 2 Guidance on Revising This Permit

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

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

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

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

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

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

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

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

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

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

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

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

FINAL DRAFT/PROPOSED CAAPP PERMIT
Quebecor Printing Mt. Morris, Inc.
I.D. No.: 141035AAA
Application No.: 95080108
September 17, 2003

- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

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

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

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



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

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	ID number:
	Permit number:
Date received:	

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

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

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

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

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

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

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

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

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	_____
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

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

10.4 Attachment 4 Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked

FINAL DRAFT/PROPOSED CAAPP PERMIT
Quebecor Printing Mt. Morris, Inc.
I.D. No.: 141035AAA
Application No.: 95080108
September 17, 2003

yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

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

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

FINAL DRAFT/PROPOSED CAAPP PERMIT
Quebecor Printing Mt. Morris, Inc.
I.D. No.: 141035AAA
Application No.: 95080108
September 17, 2003

Mail renewal applications to:

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

DWH:psj

I. INTRODUCTION

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

Quebecor Printing is located at 404 North Wesley Avenue in Mt. Morris. Quebecor Printing is a commercial printer providing, binding and mailing services to the publish industry. The primary products manufactured at this site include, but are not limited to, magazines, catalogs, newspaper inserts, tabloid magazines, and retail and wholesale advertising circulars.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
RP5	Rotogravure Printing Press #5	1962	Carbon Adsorption System
RP6	Rotogravure Printing Press #6	1967	Carbon Adsorption System
RP9	Rotogravure Printing Press #9	1987	Carbon Adsorption System
RP10	Rotogravure Printing Press #10	1990	Carbon Adsorption System
RP11	Rotogravure Printing Press #11	1992	Carbon Adsorption System
RP12	Rotogravure Printing Press #12	1996	New Carbon Adsorption System
PP1	Rotogravure Proof Press #1	1990	Carbon Adsorption System
PP7	Rotogravure Proof Press #7	1961	Carbon Adsorption System
CW1	Cylinder Wash Tank	1990	Carbon Adsorption System
OP2	Lithographic Offset Printing Press #2	1989	Thermal Regenerative Oxidizer
OP4	Lithographic Offset Printing Press #4	1989	Thermal Regenerative Oxidizer
OP5	Lithographic Offset Printing Press #5	1989	Thermal Regenerative Oxidizer
PC1	Paper Cutting Operations #1	1968	Cyclone #1
PC2	Paper Cutting Operations #2	1987	Cyclone #2
PS1	Paper Shredding Operations #1	1960	Cyclone #3

Emission Unit	Description	Date Constructed	Emission Control Equipment
PS2	Paper Shredding Operations #2	1986	Gruendler Filter/Collection System
BO2	Boiler #2 16.7 mmBtu/hr	1958	None
BO3	Boiler #3 16.7 mmBtu/hr	1958	None
BO4	Boiler #4 16.7 mmBtu/hr	1974	None
BO5	Boiler #5 20.35 mmBtu/hr	1974	None
BO6	Boiler #6 20.35 mmBtu/hr	1991	None
CT1	Cleaning Tank #1	1995	None
CT2	Cleaning Tank #2	1995	None
CT3	Cleaning Tank #3	1993	None
CT4	Cleaning Tank #4	1990	None
FP1	Flexographic Platemaker with Distiller	1992	None
HM1	Perfect Binder Hot Melt Gluer #1	1986	None
IJ1	Ink Jetting Units	1983-1997	None
ET1	Chromium Electroplating Tank #1	1990	Multiple Stage Composite Mesh Pad Demister #1
ET2	Chromium Electroplating Tank #2	1992	Multiple Stage Composite Mesh Pad Demister #2

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

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

Pollutant	Tons/Year
Volatile Organic Material (VOM)	2,662.22
Sulfur Dioxide (SO ₂)	----
Particulate Matter (PM)	67.12
Nitrogen Oxides (NO _x)	54.58
HAP, not included in VOM or PM	0.01
TOTAL	2,783.93

IV. APPLICABLE EMISSION STANDARDS

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

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

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

V. PROPOSED PERMIT

CAAPP

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

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the 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.

VI. REQUEST FOR COMMENTS

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

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.