

217/782-2113

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

PERMITTEE

Fort Dearborn Lithograph Co.
Attn: Dilip Parikh
6035 West Gross Point Road
Niles, Illinois 60714

Application No.: 95090014 I.D. No.: 031811AAA
Applicant's Designation: Date Received: September 5, 1995
Operation of: Specialty Coating Manufacturing
Date Issued: November 30, 1998 Expiration Date: November 30, 2003
Source Location: 6035 West Gross Point Road, Niles, Cook
Responsible Official: Robert M. Domro/Chief Financial Officer

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

Revision Date Received: October 19, 2000
Revision Date Issued: March 23, 2001
Purpose of Revision: Minor Modification

This minor modification allows the addition of a UV coating system to lithographic printing line 1 with no increase in allowable emissions.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this administrative amendment. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous permit issued September 28, 1999, is incorporated herein by reference.

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

If you have any questions concerning this permit, please contact 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 #1
USEPA

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

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Fort Dearborn Lithograph Co.
6035 West Gross Point Road
Niles, Illinois 60714
312/774-4321

ID No.: 031811AAA

Standard Industrial Classification: 2752, Commercial Printing,
Lithographic

1.2 Owner/Parent Company

Fort Dearborn Lithograph Co.
6035 West Gross Point Road
Niles, Illinois 60714

1.3 Operator

Fort Dearborn Lithograph Co.
6035 West Gross Point Road
Niles, Illinois 60714

Mr. Dilip Parikh
847/774-4321

1.4 General Source Description

Fort Dearborn Lithograph Co. is located at 6035 West Gross Point Road in Niles. Four sheet-fed offset lithographic printing lines and a U.V. Coating Line are used to print and coat food and consumer labels. Other emission units at the source include a scrap paper collector/cyclone and a boiler.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

acfm	Actual cubic feet per minute
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
Btu	British thermal unit
EC	degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
EF	degrees Fahrenheit
ft ³	cubic foot
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
EK	degrees Kelvin
Kg	kilogram
kW	kilowatts
lb	pound
m	meter
Mg	Megagram
mmBtu	Million British thermal units
mmHg	Millimeters of Mercury
mo	month
MW	Megawatt
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
psia	pounds per square inch absolute
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
T	Ton
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
wt. %	Weight percent
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

- a. Ink Storage Area
- b. Stripping Plate Room
- c. Waste Ink/Solvent Drums
- d. Used Rag Storage Drums

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:

N/A

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:

N/A

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

3.2 Addition of Insignificant Activities

3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

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

3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed
P1	Sheet-fed Offset Lithographic Printing Line 1 with UV Coating System	1998
P2	Sheet-fed Offset Lithographic Printing Line 2	4/91
P3	Sheet-fed Offset Lithographic Printing Line 3	8/94
P7	Sheet-fed Offset Lithographic Printing Line 7	7/93
C1	U.V. Coating Line 1	12/93
SC	Scrap Paper Collector/Cyclone	1972
B1	Boiler 1	1954

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emission.

5.2 Applicable Regulations

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

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

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b.
 - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
 - ii. The operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with the requirements set forth by Condition 5.2.2(b) and shall be submitted to the Illinois EPA pursuant to 35 IAC 212.312.
 - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program.
- c. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater

than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm, pursuant to 35 IAC 214.301.

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

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

5.3 Non-Applicability of Regulations of Concern

This permit is issued based on the source not being subject to 40 CFR 63, Subpart KK National Emission Standards for Printing and Publishing Industry, because the source operates lithographic printing lines rather than rotogravure and flexographic printing lines.

5.4 Source-Wide Operational and Production Limits and Work Practices

N/A

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. These limitations reflect the information provided in the CAAPP Application, A Fee Determination for CAAPP Permit, @ Form 292-CAAPP. The overall source emissions shall be determined by adding emissions from all emission units.

Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	52
Sulfur Dioxide (SO ₂)	1
Particulate Matter (PM)	4
Nitrogen Oxides (NO _x)	2
HAP, not included in VOM or PM	
TOTAL	59

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

NSR Explanation

A netting exercise was performed in 1994 to allow the operation of lithographic printing line 3 and a netting exercise was performed in 1998 to allow the operation of lithographic printing line 1. Construction permits 98040097, 94070024 and operating permit 72120823 are the permits involved in the netting exercises.

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:

- a. Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.
- b. The mass of all HAP materials used and the mass fraction of HAP present in each HAP containing material used, on an annual basis.

5.6.2 Retention and Availability of Records

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

- a. The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.
- b. The Permittee shall submit the records required by Condition 5.6.1(b) for the previous calendar year with the annual emissions report.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

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.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

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

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

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

6.2 Applicability

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

6.3 Obligation to Hold Allotment Trading Units (ATUs)

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

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).

- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

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

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

6.6 Quantification of Seasonal VOM Emissions

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

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the

source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.650(a), and shall be submitted in accordance with the following:

- i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
- ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Agency;
 - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

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

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source, as it is a participating source, is 104 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 11.75 tons.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Section 7 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments

There are no contingent allotments for this source.

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

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

6.9 Recordkeeping for ERMS

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

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

6.10 Federal Enforceability

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

7.0 UNIT SPECIFIC CONDITIONS

7.1 Units P1-P3, and P-7 Sheet-fed Offset Lithographic Printing Lines

7.1.1 Description

Four sheet-fed offset lithographic printing lines are used to print food and consumer labels. All presses are equipped with infrared or hot air heaters. Printing Line 1 is also equipped with a UV coating system.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
P1-P3	3 Sheet-fed Offset Lithographic Printing Lines	None
P7	Sheet-fed Offset Lithographic Printing Line 7	None

7.1.3 Applicable Regulations

- a. An affected printing line for the purpose of these unit specific conditions, is a printing line listed in Condition 7.1.2.
- b. The owner or operator of the affected printing lines shall not operate the printing lines unless the following conditions are complied with [35 IAC 218.407(a)]:
 - i. The as-applied fountain solution shall meet one of the following requirements:
 - A. The VOM content of the as-applied fountain solution is 8.5% or less, by volume, and the temperature of the fountain solution is maintained below 15.6EC(60EF), measured at the reservoir or the fountain tray; or
 - B. The VOM content of the as-applied fountain solution shall be 5 percent or less, by volume; or
 - ii. The cleaning solution shall meet one of the following requirements:
 - A. The VOM content of the as-used cleaning solution is less than or equal to 30 percent, by weight; or

B. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20EC(68EF).

iii. The VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line shall be kept, stored and disposed of only in closed containers.

c. The Permittee shall not apply any coating on the affected printing lines that exceeds a VOM content of 2.3 lbs/gallon (minus water and any compounds which are specifically exempted from the definition of VOM) pursuant to 35 IAC 218.204(c) Paper Coating. This regulation does not apply to the coldest lithographic inks.

d. 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 affected printing line [35 IAC 218.301]. If no odor nuisance exists this limitation shall apply only to photochemically reactive material.

7.1.4 Non-Applicability of Regulations of Concern

N/A

7.1.5 Operational and Production Limits and Work Practices

N/A

7.1.6 Emission Limitations

a. The VOM emissions from printing line No. 1 shall not exceed the following limits:

	<u>VOM Emissions</u>
Monthly	3,008 pounds
Annually	12.02 tons

b. The combined total VOM emissions from the four sheet-fed offset lithographic printing lines (printing lines No. 1, 2, 3, and 7) shall not exceed the following limits:

	<u>VOM Emissions</u>
Monthly	12,018 pounds
Annually	48.07 tons

Note: Total VOM emissions allowed from printing lines 1, 2, 3, and 7 are 48.07 tons. It is not $48.07 + 12.02 + 14.9 + 14.88$ tons.

- c. The VOM emissions from printing line No. 3 shall not exceed the following limits:

	<u>VOM Emissions</u>
Monthly	3,725 pounds
Annually	14.9 tons

- d. The VOM emissions from printing line No. 7 shall not exceed the following limits:

	<u>VOM Emissions</u>
Monthly	3,725 pounds
Annually	14.88 tons

- e. All of the above limitations were established in construction permit 98040097, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned construction permit does not constitute a new major source or major modification pursuant to 35 IAC Part 203.

7.1.7 Testing Requirements

- a. Upon request by the Illinois EPA, the VOM content of lithographic inks, fountain solutions, fountain solution additives, coating and/or cleaning solutions shall be determined according to USEPA Reference Method 24 specified in 40 CFR 60 Appendix A, pursuant to 35 IAC 218.105(a).
- b. Upon request by the Illinois EPA, the composite partial vapor pressure of cleaning solutions complying with the vapor pressure requirements shall be tested in accordance with 35 IAC 218.110.
- c. The manufacturer's specifications for VOM contents for fountain solution additives, cleaning solutions, and inks may be used to fulfill the testing requirements if such manufacturer's specifications are results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a) provided, however, Method 24 shall be used to determine compliance.
- d. If the Permittee intends to take credit for VOM containing waste shipped off-site, then the percent

concentration of solvent in the VOM containing waste from the affected printing lines shall be determined according to USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

7.1.8 Monitoring Requirements

- a.
 - i. The owner or operator of any lithographic printing line(s) relying on the temperature of the fountain solution to demonstrate compliance shall install, maintain, and continuously operate a temperature monitor of the fountain solution in the reservoir or fountain tray, as applicable [35 IAC 218.410(a)(1)].
 - ii. The temperature monitor must be capable of reading with an accuracy of 0.3°C or 0.5°F, and must be attached to an automatic, continuous recording device such as strip chart, recorder, or computer, with at least the same accuracy, that is installed, calibrated and maintained in accordance with the manufacturer's specifications. If the automatic, continuous recording device malfunctions, the owner or operation shall record the temperature of the fountain solution at least once every two operating hours. The automatic, continuous recording device shall be repaired or replaced as soon as practicable [35 IAC 218.410(a)(2)].
- b. Fountain Solution Monitoring Requirements

The following monitoring requirements shall be performed according to 35 IAC 218.410 for the fountain solution. The Permittee shall comply with one of the three options:

- i. Maintain records of the VOM content of the fountain solution in accordance with 35 IAC 218.411(c)(2)(C) [Condition 7.1.9(a)(ii)(A) of this permit]; or
- ii. Take a sample of the as-applied fountain solution from the fountain tray or reservoir, as applicable, each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution in the fountain tray or reservoir, and determine compliance with the VOM content limitation of the as-applied fountain solution by using one of the following methods:

- A. With a refractometer or hydrometer with a visual, analog, or digital readout and with an accuracy of 0.5 percent. The refractometer or hydrometer must be calibrated with a standard solution for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications, against measurements performed to determine compliance. The refractometer or hydrometer must be corrected for temperature at least once per 8-hour shift or once per batch of fountain solution prepared or modified, whichever is longer; or
 - B. With a conductivity meter if it is demonstrated that a refractometer and hydrometer cannot distinguish between compliant and noncompliant fountain solution for the type and amount of VOM in the fountain solution. A source may use a conductivity meter if it demonstrates that both hydrometers and refractometers fail to provide significantly different measurements for standard solutions containing 95 percent, 100 percent and 105 percent of the applicable VOM content limit. The conductivity meter reading for the fountain solution must be referenced to the conductivity of the incoming water. A standard solution shall be used to calibrate the conductivity meter for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications.
- iii. For fountain solutions to which VOM is added at the source with automatic feed equipment, determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions to VOM up to a pre-set level. The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications.

7.1.9 Recordkeeping Requirements

a. Fountain Solution Recordkeeping Requirements

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

ii. The following is required for a fountain solution to which VOM is not added automatically:

A. For each batch of as-applied fountain solution, the following information shall be collected and recorded [35 IAC 218.411(c)(2)(C)]:

1. Date and time of preparation and each subsequent modification of the batch;
2. Volume and VOM content of each component used in, or subsequently added to, the fountain solution batch;
3. Calculated VOM content in terms of volume percent of the as-applied fountain solution; and
4. Any other information necessary to demonstrate compliance with the applicable VOM content limits.

B. As an alternative to (A), the owner or operator shall collect and record the following when a hydrometer, refractometer or conductivity meter is used to comply with the monitoring requirements [35 IAC 218.411(c)(2)(B)].

1. The date and time of preparation of each batch of fountain solution, and each subsequent modification, of the batch;
2. The results of each measurement taken in accordance with 35 IAC

218.410(b)(1)(B) [Condition 7.1.8(b)(ii)]. Measurements are required to be taken each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution;

3. Documentation of the periodic calibration of the meter in accordance with the manufacturer's specifications, including date and time of calibration, personnel conducting, identity of standard solution, and resultant reading; and
4. Documentation of the periodic temperature adjustment of the meter, including date and time of adjustment, personnel conducting and results.

iii. If the owner or operator relies on the temperature of the fountain solution to comply with the requirements 35 IAC 218.407(a)(3) then the following records shall be kept [35 IAC 218.411(c)(2)(D)].

- A. The temperature of the fountain shall be recorded as monitored in accordance with 35 IAC 218.410(a)(1) & (2).
- B. A maintenance log for the temperature monitoring devices and automatic, continuous temperature recorders detailing all routine and non-routine maintenance performed, including dates and duration of any outages.

b. Cleaning Solution Recordkeeping Requirements

i. For each batch of cleaning solution used with an affected printing line, the Permittee shall collect and record the following information [35 IAC 218.411(d)(2)(C)]:

- A. The name and identification of each cleaning solution;
- B. Date and time of preparation, and each subsequent modification, of the batch;

- C. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent;
 - D. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
 - E. The VOM composite partial vapor pressure of each as-used cleaning solution in mmHg at 20EC (68EF).
- ii. The Permittee shall record the date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any [35 IAC 218.411(d)(2)(D)].
- c. The Permittee shall collect and record the following information for the affected printing lines:
 - i. The VOM content of each ink, coating, fountain solution, cleaning solution and any other VOM containing materials used with basis, e.g., supplier data sheet or laboratory analysis report.
 - ii. The total usage of ink, coating, fountain solution, cleaning solution and any other VOM containing materials used, in pounds or tons on a monthly basis for the 4 printing lines.
 - iii. VOM emissions calculated in accordance Condition 7.1.12.
 - iv. The following information shall be kept on a per line basis for printing lines 1, 3 and 7.

The usage of ink, coating, fountain solution, cleaning solution and any other VOM containing materials used in pounds or tons on a monthly basis.
 - v. Results of VOM content testing for VOM containing waste, if applicable.
 - vi. Hours of operation for each printing line.

7.1.10 Reporting Requirements

- a. The Permittee shall notify the Illinois EPA, Compliance Section of noncompliance of an affected printing line with the permit requirements within 30 days of the violation 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.

- b. Report for Changing Method of Compliance

If the Permittee changes the method of demonstrating compliance with the applicable VOM content limitations in 35 IAC 218.407 or changes the method of demonstrating compliance with the VOM content limitations for fountain solutions or cleaning solutions, the Permittee shall certify compliance for such new methods in accordance with the requirements of the certification reports of Condition 9.8 within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing line(s) will be in compliance with the applicable requirements of 35 IAC 218.407 and the requirements of this permit [35 IAC 218.411(c)(4) and (d)(4)].

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Any combination of compliant materials that do not exceed facility wide VOM emission limits can be used in the printing lines.

7.1.12 Compliance Procedures

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

- a. The Permittee may presume 95% retention of ink VOM in the web for non-heat offset lithographic presses, as stated in 35 IAC 218.411(a)(1)(B)(iii).
- b. Emission Calculations for Non-Heatset Offset Lithographic Presses shall be based on the following:
$$\text{Ink VOM Emissions} = \text{Ink Usage} \times \text{VOM Content} \times (0.05)$$
- c. Fountain Solution VOM Emissions = Fountain Solution Usage x VOM Content
- d. Cleaning Solution VOM Emissions = Cleaning Solution Usage x VOM Content

- e. For manual cleaning solution with a VOM composite partial vapor pressure less than 10 mmHg at 20°C the following equation may be used in place of the above cleaning solution emission determination method, provided proper handling is performed as stated in Condition 7.1.3(b)(iii). This is stated in USEPA's Alternative Control techniques Document Offset Lithographic Printing (EPA 453/R-94-054, June 1994):

$$\text{Cleaning Solution VOM Emissions} = \text{Cleaning Solution VOM Usage} \times \text{VOM Content} \times 0.5$$

- f. For low vapor pressure coatings that have similar properties to the non-heatset ink, the 95% retention factor may also be used for these type of coatings.
- g. Other VOM Emissions = VOM Contained in Other Materials
- h. Total VOM Emissions = Ink VOM Emissions + Fountain Solution VOM Emissions + Cleaning Solution VOM Emissions + Other VOM Emissions

7.2 Unit C1: U.V. Coating Line 1

7.2.1 Description

Fort Dearborn has one off-line coater to apply ultraviolet cured coating. The ultraviolet cured coating operation is used to apply surface protection and appearance enhancement for printed labels.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
C1	U.V. Coating Line 1	None

7.2.3 Applicable Provisions and Applicable Regulations

- a. An affected coating line^o for the purpose of these unit specific conditions, is a coating line using low VOM content coatings in order to achieve compliance.
- b. The Permittee shall not apply any coating on the affected coating line that exceeds a VOM content of 2.3 lbs/gallon (minus water and any compounds which are specifically exempted from the definition of VOM) pursuant to 35 IAC 218.204(c) Paper Coating.

7.2.4 Non-Applicability of Regulations of Concern

The affected coating line is not subject to 35 IAC 218.301 Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material, which excludes the affected coating line from this requirement.

7.2.5 Operational and Production Limits and Work Practices

N/A

7.2.6 Emission Limitations

- a. Emissions and operation of the affected coating line shall not exceed the following limits:

<u>Material</u>	<u>Operating Hours (hr/yr)</u>	<u>VOM Content (Wt.%)</u>	<u>Process Rate (lb/hr)</u>	<u>VOM Emissions (lb/hr)</u>	<u>Emissions (T/yr)</u>
Coating	2,080	5	28	1.4	1.46
Wash Solvent	2,080	100	2.08	2.08	2.16
				Total	3.62

- b. Total VOM emissions and material usages of the affected coating line and printing lines of Condition 7.1 are limited in Condition 5.5.

7.2.7 Testing Requirements

- a. Upon request by the Illinois EPA, the VOM contents of coatings shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 [35 IAC 218.211(a)].
- b. If the Permittee intends to take credit for VOM containing waste shipped off-site, then the percent concentration of solvent in the VOM containing waste from the affected coating line shall be determined according to USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

7.2.8 Monitoring Requirements

N/A

7.2.9 Recordkeeping Requirements

The Permittee shall collect and record the following information for the affected coating line:

- a. The name and identification number of each coating as applied.
- b. The VOM Content (lb VOM/gal and wt. %) of each coating used with basis, accompanied by a copy of the supporting information, e.g., supplier data sheet or laboratory analysis report.
- c. The usage of coating and wash solvent in pounds on a monthly basis.
- d. VOM content of wash solvent
- e. VOM emissions calculated in accordance with Condition 7.2.12.
- f. Results of VOM content testing for VOM containing waste, if applicable.

7.2.10 Reporting Requirements

- a. The Permittee shall notify the Illinois EPA, Compliance Section of noncompliance of the affected Coating line with the permit requirements within 30 days of the violation 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.
- b. At least 30 calendar days before changing the method of compliance with 35 IAC 218.204 to 35 IAC 218.205 or 35 IAC 218.207, the owner or operator shall certify compliance for such new methods in accordance with the requirements of the certification reports of Condition 9.8 [35 IAC 218.211(C)(3)(B)].

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance with VOM emission limits for the affected coating line shall be based on the following:

VOM Emissions = Material Usage x VOM Content

7.3 Unit SC Scrap Paper Collector/Cyclone

7.3.1 Description

This equipment is used to collect paper scrap from the printing and coating lines. The cyclone portion of this unit is used to control particulate matter emissions, however since the scrap paper collector/cyclone is one unit the cyclone is not listed as being emission control equipment.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
SC	Maren Scrap Paper Collector/Cyclone	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. An affected scrap paper collector for the purpose of these unit specific conditions is a scrap paper collector listed in Condition 7.3.2.
- b. The affected scrap paper collector is subject to 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 |
|--|---|------|------|
- 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 scrap paper collector/cyclone 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
- The Permittee shall maintain records of the following items for the affected scrap paper collector to demonstrate compliance with Conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:
- a. Operating records of material throughput on a monthly basis in tons.
 - b. A maintenance log for the scrap paper collector/cyclone detailing all routine and nonroutine maintenance performed.
- 7.3.10 Reporting Requirements
- a. The Permittee shall notify the Illinois EPA Compliance Section of noncompliance of the affected scrap paper collector with the permit requirements within 30 days of the violation 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
- N/A
- 7.3.12 Compliance Procedures

Compliance with the PM limitations of Condition 7.3.3 is demonstrated by proper operation of the scrap paper collect/cyclone, performance of the operational and work practice requirements of Condition 7.3.5 and performance of the recordkeeping and reporting requirements of Conditions 7.3.9 and 7.3.10.

7.4 Unit B1 Boiler 1

7.4.1 Description

A natural gas-fired boiler with a heat input capacity of 9 million Btu per hour is used for space heating.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
B1	Boiler 1	None

7.4.3 Applicable Regulations

- a. An affected boiler for the purpose of these unit specific conditions is boiler listed in Condition 7.4.2.
- b. An affected boiler is subject to the opacity limits identified in Condition 5.2.2(c).

7.4.4 Non-Applicability of Regulations of Concern

- a. The affected boiler is not subject to 35 IAC 217.141, emissions of NO_x from existing fuel combustion emission units in major metropolitan areas, because the actual heat input of the affected boiler is less than 73.2 MW (250 mmBtu/hr).
- b. The boiler is not subject to 35 IAC 216.121, emissions of CO from existing fuel combustion emission units, because the actual heat input of each affected boiler is less than 2.9 MW (10 mmBtu/hr).
- c. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use of Organic Material.

7.4.5 Operational and Production Limits and Work Practices

The affected boiler shall only be operated with natural gas as the fuel.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5.1, the affected boilers are subject to the following:

None

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

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

- a. Total natural gas usage for the affected boiler (ft³/year). These records shall be kept on a rolling 12 month sum, based on the current month's records plus the preceding 11 months.
- b. Annual aggregate NO_x, PM, SO₂, and VOM emissions from the affected boiler, based on fuel consumption and the applicable emission factors. These records shall be kept on a rolling 12 month sum, based on the current month's records plus the preceding 11 months.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. Notification within 60 days of operation of an affected boiler that may not have been in compliance with the opacity limitations in Condition 5.2.2(b), with a copy of such record for each incident.
- b. Emissions of NO_x, PM, SO₂, or VOM from the affected boiler in excess of the limits specified in Condition 5.5.1 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with the emission limits in Conditions 5.5.1 shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

- i. Emissions from the affected boilers burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10⁶ ft³)</u>
PM	7.5
NO _x	100
SO ₂	0.6
VOM	5.3

These are the emission factors for uncontrolled natural gas combustion in small industrial boilers (0.3 - < 10 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement F, October, 1996. VOM emission factor based on Total Organic Carbon (TOC) factor corrected for 52% methane.

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

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after July 23, 1998 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Program

No permit revision shall be required for increases in emissions allowed under any approved economic incentive, marketable permits, emissions trading, or other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. (Section 39.5(7)(o)(vii) of the Act)

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or

operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other process, emissions, or composition parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

All 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:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;

- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

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

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

Illinois Environmental Protection Agency
Division of Air Pollution Control
1701 South 1st Avenue
Maywood, Illinois 60153
 - iii. Illinois EPA - Air Permit Section

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

United States EPA (AR - 18J)
Air & Radiation Branch (Illinois - Indiana)
77 W. Jackson Boulevard
Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

- a. The provisions of Section 303 (emergency powers) of the Clean Air Act, 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 Clean Air Act; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including 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 Clean Air Act 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 Environmental Protection Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege. [Section 39.5(7)(0)(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) of the Act]

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7)(e)(ii) of the Act]

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - 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: _____

DWH:psj

217/782-2113

October 31, 1997

Fort Dearborn Lithograph Company
Attn: Dilip Parikh
6035 West Gross Point Road
Niles, Illinois 60714

Re: Preliminary Draft Title V - Clean Air Act Permit Program (CAAPP) Permit

I.D. No.: 031811AAA
Application No.: 95090014

Dear Mr. Parikh:

Enclosed please find a preliminary draft Clean Air Act Permit Program (CAAPP) Permit for Fort Dearborn Lithographic Company. Please review this draft permit, indicate any corrections that need to be made and provide your comments no later than November 25, 1997.

Although the Illinois EPA is requesting comments on the draft permit at this time, it should be noted that the draft permit will not undergo public notice until the status of this source is defined in regards to the proposed Emissions Reduction Market System (ERMS). The Illinois EPA has a proposed rule making before the Illinois Pollution Control Board which will establish a Volatile Organic Material (VOM) trading program to assist in further VOM reduction in the Chicagoland sever ozone non-attainment area. This source is currently on a list of potential sources that may be subject to ERMS.

If you should have any questions regarding this permit, please contact David Hulskotter at 217/782-2113.

Sincerely,

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

DES:DWH:jar

Enclosure

cc: FOS, Region 1