

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

The Meyercord Company  
Attn: Irma Hrycyck  
365 East North Avenue  
Carol Stream, Illinois 60188

Application No.: 75020058                      I.D. No.: 043020AAF  
Applicant's Designation:                      Date Received: July 12, 2000  
Subject: Tax Stamp and Decal Printing  
Date Issued:                                      Expiration Date:  
Location: 365 East North Avenue, Carol Stream

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of the following equipment, pursuant to the above-referenced application:

- ! Two Rotogravure Printing Lines Containing Two Rotogravure Presses (Nos. 1 and 2) and Ovens
- ! Four Printing Lines Containing Four Web Screen Color Presses and Ovens
- ! Ink-Jet Numbering Machine
- ! Ink-Jet Imaging System
- ! AEI Catalytic Oxidizer Controlling all the Above
- ! Two Rewind Machines
- ! Rotogravure Press #3 Parts Washer
- ! Web Screen Parts Washer
- ! Ink-Jet Parts Washer
- ! Three Revenue Service Parts Washers
- ! Two Laboratory Hand Screens
- ! Cylinder-Making Room
- ! Lab General Proof Press
- ! Ink Vault
- ! Two Cleaver Brooks Boilers

This Permit is subject to standard conditions attached hereto and the following special condition(s)

- 1a. This federally enforceable state operating permit is issued to limit the emissions of volatile organic material (VOM), and hazardous air pollutants (HAPs) from the source to less than major source thresholds (i.e., VOM to less than 25 tons per year, HAPs to less than 10 tons per year of any single HAP and 25 tons per year of any combination of such HAPs) as further described in Attachment A. As a result the source is excluded from requirements to obtain a Clean Air Act Permit Program

permit.

- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.

- c. This permit supersedes all operating permits issued for this location.
2. Total combined emissions and material usage (including VOM and HAP emissions associated with clean-up operations) from the printing lines containing Rotogravure Presses 1 and 2, four web screen color presses and the ink jet numbering machine shall not exceed the following limits:

<u>VOM Usage<sup>1</sup></u>		<u>VOM Emissions</u>	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
10.93	131.10	1.58	19.0
<u>Single HAP<sup>2</sup> Usage</u>		<u>Single HAP<sup>2</sup> Emissions</u>	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
3.23	38.71	0.47	5.61

<sup>1</sup> As determined by summing the usage of each ink multiplied by the weight % VOM, and the usage of each solvent multiplied by the weight % VOM.

<sup>2</sup> Single HAP means any individual HAP as listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., xylene, toluene - a.k.a. toluol).

These limits are based on maximum values and an overall reduction in the emissions of VOM which would otherwise be emitted from the above-referenced equipment of 85.5% (i.e., 90% capture and 95% destruction) as required by the catalytic oxidizer control system.

3. Emissions and material usage from the wash operations containing press #3 parts washer, three revenue service parts washers (total combined), and the ink jet parts washer shall not exceed the following limits:

<u>Parts Washer</u>	<u>VOM and Single HAP<sup>2</sup> Usage<sup>1</sup></u>		<u>VOM and Single HAP<sup>2</sup> Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
Press #3	160	0.96	160	0.96
3 Revenue Service	192	1.15	192	1.15
Ink Jet	30	0.18	30	<u>0.18</u>
Total Combined = 2.29				

<sup>1</sup> As determined by summing the usage of each solvent multiplied by the weight % VOM.

<sup>2</sup> Single HAP means any individual HAP as listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., xylene, toluene - a.k.a. toluol).

These limits are based on maximum values. For clarification, both usage and emissions of VOM shall not exceed the limits, and usage and emissions of any single HAP shall not exceed the limits.

4. Operations and emissions from the following equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Operating Hours (Hrs/Yr)</u>	<u>VOM and Single HAP Emissions (Lbs/Hr) (Tons/Yr)</u>	
2 Lab Hand Screens	1,000	0.4	0.2
Cylinder Making Room	200	0.01	0.01
Lab General Proof Press	1,000	0.1	0.05
Ink Vault	3,000	0.8	<u>1.2</u>
Total Combined = 1.46 Tons/Yr			

These limits are based on maximum operations and emissions.

5. Operations and emissions of the ink jet imaging system shall not exceed the following limits:

<u>Ink Usage (Tons/Mo) (Tons/Yr)</u>		<u>VOM Content (Weight %)</u>	<u>VOM Emissions (Tons/Mo) (Tons/Yr)</u>	
1.24	14.83	93	0.17	2.0

These limits are based on the maximum ink usage, maximum VOM content of inks, and an overall reduction in VOM emissions of 85.5% resulting from the catalytic oxidizer. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. The following items of equipment shall not use VOM:

- Two rewind machines

As a result, there will be no emissions of VOM from these units.

7. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

8. Operations and emissions of each of the 2 boilers shall not exceed the following limits:

<u>Firing Rate (mmBtu/Hr)</u>	<u>Nitrogen Oxides Emissions U(Lbs/Hr) (Tons/Yr)</u>	
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20.9

$$\text{Total Combined NO}_x = \frac{2.09}{4.18} \quad \frac{9.15}{18.30}$$

These limits are based on standard emission factors and continuous operations (8,760 hr/yr). A conversion of 1,000 Btu/ft<sup>3</sup> is used.

9. This permit is issued based upon negligible emissions of nitrogen oxides from each of the units specified below. For this purpose, emissions of nitrogen oxides from each unit shall not exceed a nominal emission rate of 0.01 tons/yr.

<u>Unit</u>	<u>Nitrogen Oxides Emissions (Tons/Yr)</u>
Web Screen 4 Oven	0.01
Web Screen 5 Oven	0.01
Roto Press 1 Oven	0.01
Web Screen 3 Oven	0.01
Catalytic Oxidizer	0.01

These emissions are based on a maximum nominal negligible emission rate from each unit.

10. Natural gas shall be the only fuel utilized at this source.
11. The catalytic oxidizer capture and control system shall be operated to achieve a minimum of 90% capture and 95% destruction of the emissions of VOM from the rotogravure printing lines, web screen printing lines, and ink jet numbering machine.
- 12a. The catalytic oxidizer shall be in operation at all times that the associated emission unit(s) is (are) in operation and emitting.
- b. The oxidizer shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor specifications at all times that the oxidizer is in use. This device shall monitor and record the temperature rise across each oxidizer bed.
- c. The catalytic oxidizer capture and control system shall be operated in a manner consistent to good air pollution control practices.
- d. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
- e. The catalytic oxidizer shall be equipped with a continuous monitoring device which measures the temperature rise across the catalytic bed. The temperature before the catalyst bed shall not be below the average gas temperature immediately before the catalyst bed measured during the most recent performance test that demonstrated that the operation was in compliance.

- f. The catalytic oxidizer shall not be seasonally shut down. That is, the seasonal shutdown provisions of 35 Ill. Adm. Code 218.107 are not permitted.

COMPLIANCE DETERMINATIONS

- 13a. Compliance with monthly limits shall be determined from the recordkeeping required by this permit.
- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
- c.
  - i. Monthly calculations shall be made of the total emissions of VOM and of single HAPs using the data specified in the recordkeeping requirements of this permit (e.g., usage, density, and weight percent VOM and HAP content).
  - ii. Calculations shall be made using a maximum of 85.5% overall VOM emissions reduction efficiency (90% emissions capture efficiency and 95% emissions destruction in the oxidizer), where applicable.
- d. The calculation of the emissions of VOM and single HAPs shall be made using the VOM and HAP content as determined through the testing of the coating, ink, or solvent specified in 35 Ill. Adm. Code 218.105.

RECORDKEEPING

- 14a. The Permittee shall collect and record the following information:
  - i. A list giving the name and identification number of each ink, solvent, and any other material used containing VOM as applied;
  - ii. VOM content in weight percent for each ink, solvent, and any other material used containing VOM as applied;
  - iii. Density in pounds per gallon of each ink, solvent, and any other material used containing VOM as applied;
  - iv. Actual usage rate in tons per month and tons per year for each ink, solvent, and any other material used containing VOM as applied;
  - v. A list of HAPs present and the weight percent content of each HAP for each ink, clean-up solvent and other material containing VOM;
  - vi. Emissions of VOM and single HAPs on a monthly and 12 month rolling total basis in tons/month and tons/year; and
  - vii. Operating hours of the 2 lab hand screens, cylinder-making room, lab general proof press, and the ink vault.
- b. The Permittee shall collect and record the following information each

day for the catalytic oxidizer:

- i. Catalytic oxidizer monitoring data, including temperature rise across the catalytic bed.

- ii. A log of operating time for the capture system, oxidizer, monitoring device, and the associated emission unit(s).
  - iii. A maintenance log for the capture system, oxidizer, and monitoring device detailing all routine and non-routine maintenance performed including dates and duration of any outages, operating data, dates of catalyst inspections, inspection findings, and catalyst replacements.
- c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.

#### REPORTING

15. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
- 16a. The Permittee shall submit the following additional information from the prior calendar year with the Annual Emissions Report, due May 1st of each year:
- i. VOM and single HAP usage (tons/yr).
  - ii. Operating hours of the 2 lab hand screens, cylinder-making room, lab general proof press, and the ink vault (hrs/yr each).
- b. The Permittee shall indicate the dates of any exceedance from the prior calendar year. If there have been no exceedances, then a statement to that effect shall be submitted.
17. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at

the following address unless otherwise indicated:

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

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Please note that this permit is revised to no longer include one non-heatset offset press, one strip and rewind machine, one imprinter and die cutter, and one solvent distillation unit.

Also note that the nitrogen oxides emissions in Condition 8 are lower due to a revised emission factor.

If you have any questions on this, please call John Blazis at 217/782-2113.

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

DES:JPB:jar

cc: Illinois EPA, FOS Region 1  
Illinois EPA, Compliance Section  
Lotus Notes

Attachment A - Emissions Summary (Revised)

Single HAP	
VOM Emissions	Emissions
<u>(Tons/Yr)</u>	<u>(Tons/Yr)</u>
! Total combined from printing lines containing two rotogravure presses (Nos. 1 and 2) four web screen color presses and ink jet number machine	
19.0	5.61
! Two Rewind Machines	
0.0	0.0
! Press #3 Parts Washer	
0.96	0.96
! Ink Jet Parts Washer	
0.18	0.18
! Three Revenue Service Parts Washers	
1.15	1.15
! Two Laboratory Hand Screens	
0.2	0.2
! Cylinder Making Room	
0.01	0.01
! Lab General Proof Press	
0.05	0.05
! Ink Vault	
1.2	1.2
! Ink Jet Imaging System	
<u>2.0</u>	<u>0.59</u>
Total = 24.75	9.95

Nitrogen Oxides Emissions

<u>(Tons/Yr)</u>	
! Two Cleaver Brooks Boilers	
18.30	
! Printing Line Ovens	
0.04	
! Catalytic Oxidizer	
<u>0.01</u>	
Total - 18.35	

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