

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Imageworks Manufacturing, Inc. for a Renewal of the
Federally Enforceable State Operating Permit (FESOP)
49 South Street
Park Forest, IL 60466

Site Identification No.: 74030060
Application No.: 031111AAU

Illinois EPA Contacts
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I. INTRODUCTION

Imageworks Manufacturing, Inc. has applied for renewal of their Federally Enforceable State Operating Permit (FESOP) for its specialty printing facility at 49 South Street in Park Forest. This facility requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before issuing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue. This application is for a FESOP revision. The source is requesting to remove printing material usages and obtain higher monthly limits however, no annual emissions will increase from the previous permit.

II. SOURCE DESCRIPTION

Imageworks Manufacturing, Inc. is a small specialty printer of computer mouse pads, wrist rests, nameplates, labels and signs using plastic and metal substrates. Pollutants of concern are Volatile Organic Material (VOM) and Hazardous Air Pollutants (HAPs), which are emitted during the use of a wide variety of inks, fountain solutions and solvents.

A printing facility uses ink, solvents, and chemical solutions in various printing presses to produce customer specific graphic arts. All printing presses have in common the application of solvent based inks and chemical solutions to the surface of moving material and the evaporation of the solvent exhausted from the system.

The emissions of volatile organic material (VOM) result from the use of lithographic printing-related materials and coating materials such as lithographic inks, fountain solution additives, coatings and cleaning solvents. These materials contain organic solvents which are emitted to the atmosphere during their use. In addition, all cleaning materials, including the used cleaning towels, are stored in closed containers at all times they are not in use.

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has applied for a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major

source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need not obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The Board has specific standards for units emitting volatile organic material in the greater Chicago Area. Lithographic printing is regulated by 35 Ill. Adm. Code 218.407. These regulations require fountain solution to be five percent VOM by volume or less. Cleaning solutions used on any lithographic printing lines are required to be thirty percent VOM or less or they are required to have a low VOM composite partial vapor pressure less than 10 mmHg at 20°C (68°F). However, this facility has agreed to keep VOM emissions from lithographic printing to 15 pound per day and the regulations do not apply at these levels. The main regulation that would apply would be 35 Ill. Adm. Code 218.301, which would require the VOM emissions from any emission unit not to exceed 8 pounds per hour. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

V. CONTENTS OF THE PERMIT

This permit that the Illinois EPA is proposing to renew, will identify the specific emission standards that apply to the emission units at the plant. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit conditions would also require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and that the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for issuance of its permit. The Illinois EPA is therefore proposing to renew the 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 IAC Part 166.