

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Videojet Technologies, Inc.  
Attn: Robert Harcar  
1500 Mittel Boulevard  
Wood Dale, Illinois 60191-1073

Application No.: 10030037                      I.D. No.: 043800AAL  
Applicant's Designation: PRINTPRO1              Date Received: March 12, 2010  
Subject: Non-Contact Inkjet Unit Assembly and Testing  
Date Issued: August 6, 2010  
Location: 1500 Mittel Boulevard, Wood Dale, DuPage County, 60191-1073

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of 150 inkjet printing unit test stations as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This permit is issued based on the 150 inkjet printing unit test stations not constituting a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 Ill. Adm. Code Part 203. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the Volatile Organic Material (VOM) emissions from the above-listed equipment below the levels that would trigger the applicability of these rules.
  - b. This permit is issued based on the emission of Hazardous Air Pollutants (HAP) as listed in Section 112(g) of the Clean Air Act from the above-listed equipment being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from the above-listed equipment not triggering the requirements of Section 112(g) of the Clean Air Act.
  - c. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
2. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kgs/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304, and the following exception: if no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.

3. This permit is issued based on the inkjet printing unit test stations not being subject to 35 Ill. Adm. Code 218 Subpart TT (Other Emission Units). This is a result of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year from the subject emission units.
4. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 5a. Total combined operations and emissions of the 150 inkjet printing unit test stations shall not exceed the following limits:

- i. VOM Emissions from usage of Ink and Solutions:

VOM in Ink and Solutions Usage		VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
1.72	17.2	1.72	17.2

These limits are based on maximum VOM usage and a material balance. Usage of VOM in ink and makeup solutions usage limits shall be determined using the following equation:

$$\text{VOM Usage} = \sum (\text{material usage}_i) \times (\text{weight \% VOM of material}_i)$$

- ii. VOM Emissions from usage of Cleaning Solutions:

Adjusted* VOM in Cleaning Solutions Usage		VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
0.53	5.3	0.53	5.3

\* Adjusted VOM in cleaning solutions usage = actual VOM in cleaning solutions usage - VOM from cleaning solutions which is collected in drums and shipped offsite.

These limits are based on a material balance and take into account the VOM used in the cleaning solutions which is collected in drums and shipped offsite and therefore not emitted at this plant.

- b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the 150 inkjet printing unit test stations shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons per year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this project not triggering the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit from the Illinois EPA.

- c. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
6. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
7. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. A list giving the name and identification number of each ink, makeup solution, cleaning solution, and any other material used containing VOM.
  - ii. A list of HAPs present and the weight percent content of each HAP for each ink, makeup solution, cleaning solution, and any other material used containing VOM.
  - iii. The weight percent VOM content of each ink, makeup solution, cleaning solution, and any other material used containing VOM.
  - iv. Actual usage rate of each ink, makeup solution, cleaning solution, and any other material used containing VOM (tons/month and tons/year).

- v. Usage rate of VOM in inks, VOM in makeup solutions, VOM used in cleaning solutions, and adjusted VOM in cleaning solutions (tons/month and tons/year).
  - vi. VOM used in cleaning solutions which is collected and shipped offsite (tons/month and tons/year).
  - vii. Usage and emissions of single HAPs (lbs/month and tons/year).
  - viii. Monthly and annual VOM and HAP emissions from the 150 inkjetprinting unit test stations, with supporting calculations (tons/month, and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) 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 or USEPA request for records during the course of a source inspection.
8. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
- 9a. If there is an exceedance of or a deviation from 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 or deviation. 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 deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications 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:

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

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

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

ECB:DWH:jws

cc: Region 1