

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NSPS SOURCE

PERMITTEE

Surface Guard, Inc.  
Attn: Patrick Dillon  
515 North Enterprise Street  
Aurora, Illinois 60504

Application No.: 05040029

I. D. No.: 043407AAI

Applicant's Designation:

Date Received: May 4, 2012

Subject: Masking Tape Manufacturing

Date Issued:

Expiration Date:

Location: 515 North Enterprise Street, Aurora, DuPage County

Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of five (5) paper and film adhesive coating lines and one (1) flexible packaging flexographic printing line pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
  - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/yr for Volatile Organic Material (VOM) and 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
  - ii. To establish federally enforceable production and operating limitations, which restrict a potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs so that the source is not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK.
  - iii. To establish federally enforceable production and operating limitations, which restrict a potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs so that the source is not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ.
  - iv. To limit the emissions of VOM from the construction of new emission units and other modifications at the source, which occurred without first obtaining construction permit(s) between

November 15, 1992 and June 15, 2005 (the period during which the Chicago area was classified as severe nonattainment for ozone), to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification.

- v. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- iv. To establish federally enforceable production and operating limitations, which restrict the potential to emit for VOM to less than 25 tons per year so that the source is not subject to the requirements of 35 Ill. Adm. Code 218.401 (Flexographic and Rotogravure Printing) and 35 Ill. Adm. Code Part 218 Subpart PP (Miscellaneous Fabricated Product Manufacturing Processes).
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. The five paper and film adhesive coating lines are subject to the New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations 40 CFR 60, Subparts A and RR. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 60.440(a), the affected facility to which the provisions of 40 CFR 60 Subpart RR apply is each coating line used in the manufacture of pressure sensitive tape and label materials.
- b. Pursuant to 40 CFR 60.440(b), any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of 40 CFR 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR 60 Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to 40 CFR 60.442(a) and all other sections of 40 CFR 60 Subpart RR.
- 3. Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith at a point beyond the property line of the source.
- 4a. Pursuant to 35 Ill. Adm. Code 218.204(c)(2), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which VOM content exceeds following emission limitations for Paper Coating. Except as otherwise provided in 35 Ill. Adm. Code

218.204(a), (c), (g), (h), (j), (l), (n), (p), and (q), compliance with the emission limitations in 35 Ill. Adm. Code 218.204 is required on and after March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code Part 218 Subpart F (Coating Operations) must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. (Note: The equation presented in 35 Ill. Adm. Code 218.206 shall be used to calculate emission limitations for determining compliance by add on controls, credits for transfer efficiency, emissions trades and cross line averaging.) The emission limitations are as follows:

On and after May 1, 2011:

	kg VOM/kg (lb VOM/lb) solids applied	kg VOM/kg (lb VOM/lb) coatings applied
i. Pressure sensitive tape and label surface coatings	0.20	(0.067)
ii. All other paper coatings	0.40	(0.08)
b. Pursuant to 35 Ill. Adm. Code 218.205(j), no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 and complying by means of 35 Ill. Adm. Code 218.205 shall operate the subject coating line unless the owner or operator has demonstrated compliance with 35 Ill. Adm. Code 218.205(a), (b), (c), (d), (e), (f), (g), (h), (i), (j), or (k) (depending upon the category of coating) through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(d):		

On and after May 1, 2011, no owner or operator of a paper coating line subject to the limitations of 35 Ill. Adm. Code 218.204(c) shall apply coatings on the subject coating line unless the requirements in 35 Ill. Adm. Code 218.205(j)(1) or (j)(2) are met:

- i. For each coating line that applies multiple coatings, all of which are subject to the same numerical emission limitation within 35 Ill. Adm. Code 218.204(c) during the same day (e.g., all coatings used on the line are subject to 0.40 kg/kg solids (0.08 kg/kg coatings)), the daily-weighted average VOM content shall not exceed the coating VOM content limit corresponding to the category of coating used; or

- ii. For each coating line that applies coatings subject to more than one numerical emission limitation in 35 Ill. Adm. Code 218.204(c) during the same day, the owner or operator shall have a site-specific proposal approved by the Illinois EPA and approved by USEPA as a SIP revision. To receive approval, the requirements of USEPA's Emissions Trading Policy Statement (and related policy), 51 Fed. Reg. 43814 (December 4, 1986), must be satisfied.
- c. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, 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 Part 218 Subpart G (Use of Organic Material) shall apply only to photochemically reactive material.
- d. Pursuant to 35 Ill. Adm. Code 218.402(b), the limitations of 35 Ill. Adm. Code 218.401(d) shall apply to all owners or operators of flexographic or rotogravure printing lines that print flexible packaging, or that print flexible packaging and non-flexible packaging on the same line, at a source where the combined emissions of VOM from all flexographic and rotogravure printing lines total 6.8 kg/day (15 lbs/day) or more (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines), in the absence of air pollution control equipment.
- 5a. This permit is issued based upon the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
- b. This permit is issued based on the pressure sensitive tape coaters at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
- 6. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.

- 7a. Pursuant to 35 Ill. Adm. Code 218.187(a)(2)(B), notwithstanding 35 Ill. Adm. Code 218.187(a)(1), cleaning operations for emission units within the following categories shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (e), (f), and (g):
- i. Flexible packaging printing;
  - ii. Paper, film, and foil coating.
- b. Pursuant to 35 Ill. Adm. Code 218.204(c)(3), the paper coating limitation set forth in 35 Ill. Adm. Code 218.204(c) shall not apply to any owner or operator of any paper coating line on which flexographic, rotogravure, lithographic, or letterpress printing is performed if the paper coating line complies with the applicable emissions limitations in 35 Ill. Adm. Code 218 Subpart H. In addition, screen printing on paper is not regulated as paper coating, but is regulated under 35 Ill. Adm. Code 218 Subpart TT. On and after May 1, 2011, the paper coating limitation shall also not apply to coating performed on or in-line with any digital printing press, or to size presses and on-machine coaters on papermaking machines applying sizing or water-based clays.
- c. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code Part 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.
- d. This permit is issued based upon the flexible packaging flexographic printing press at this source not being subject to the control requirements of 35 Ill. Adm. Code 218.401 (Flexographic and Rotogravure Printing). This is a result of the federally enforceable production and operating limitations of this permit, which restrict the maximum theoretical emissions of VOM to less than 100 tons per year and the potential to emit for VOM emissions to less than 25 tons per year. Pursuant to 35 Ill. Adm. Code 218.402(a), except as otherwise provided in 35 Ill. Adm. Code 218.401, the limitations of 35 Ill. Adm. Code 218.401 apply to all flexographic and rotogravure printing lines at a subject source. Sources with flexographic and/or rotogravure printing lines are subject sources if:
- i. Total maximum theoretical emissions of VOM from all flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines) at the source ever exceed 90.7 Mg (100 tons) per calendar year and the flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines) at the source are not limited to less than 90.7 Mg (100 tons) of VOM emissions per calendar year in the absence of air pollution control equipment through production or capacity limitations contained in a federally enforceable permit or a SIP revision; or

- ii. The flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines) at the source have a potential to emit 22.7 Mg (25 tons) or more of VOM per year.
- e. Pursuant to 35 Ill. Adm. Code 218.900(b)(1)(E), notwithstanding 35 Ill. Adm. Code 218.900(a): The requirements of 35 Ill. Adm. Code Part 218 Subpart JJ (Miscellaneous Industrial Adhesives) shall not apply to miscellaneous industrial adhesive application operations associated with paper, film, and foil coatings.
- 8. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 9a. Pursuant to 35 Ill. Adm. Code 218.206, limitations in terms of kg (lbs) of VOM emissions per 1 (gal) of solids as applied at each coating applicator shall be determined by the following equation:

$$S = \frac{C}{1 - \frac{C}{D}}$$

where:

- S = The limitation on VOM emissions in terms of kg VOM/l (lbs VOM/gal) of solids;
- C = The limitation on VOM emissions in terms of kg/l (lbs/gal) of coating (minus water and any compounds which are specifically excluded from the definition of VOM) specified in 35 Ill. Adm. Code 218.204;
- D = The density of VOM in the coating. For the purposes of calculating S, the density is 0.882 kg VOM/l VOM (7.36 lbs VOM/gal VOM)
- b. Pursuant to 35 Ill. Adm. Code 218.218(a), on and after May 1, 2011, every owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 218.204(c) shall:
  - i. Store all VOM-containing cleaning materials in closed containers;
  - ii. Ensure that mixing and storage containers used for VOM-containing materials are kept closed at all times except when depositing or removing those materials;

- iii. Minimize spills of VOM-containing cleaning materials;
  - iv. Convey VOM-containing cleaning materials from one location to another in closed containers or pipes; and
  - v. Minimize VOM emissions from the cleaning of storage, mixing, and conveying equipment.
- c. Pursuant to 35 Ill. Adm. Code 218.401(d), no owner or operator of subject flexographic or rotogravure printing lines that print flexible packaging or print flexible packaging and non-flexible packaging on the same line shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with the subject flexographic or rotogravure printing lines to be kept, stored, or disposed of in any manner other than in closed containers, or conveyed from one location to another in any manner other than in closed containers or pipes, except when specifically in use.
10. 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 nuisance.
- 11a. The VOM emissions from coating, printing and clean-up operations shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
1.5	14.8	1.5	14.8

These limits are based on the maximum adhesive, coating, ink, and solvent usage. The emissions of VOM shall be determined from the following equation:

$$E = \sum(S_i \times C_i) - \sum(W_k \times C_k)$$

where:

E = VOM or HAP emissions (ton);

S<sub>j</sub> = Adhesive, coating, ink and clean-up solvent usage (ton);

C<sub>j</sub> = VOM or HAP content of the adhesives, coatings, inks and solvents (wt. fraction);

W<sub>k</sub> = Certified amount of waste solvent sent off for disposal (ton);  
and

C<sub>k</sub> = Certified VOM or HAP content of waste solvent (wt. fraction)

- b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.8 tons/month and 7.9 tons/year of any single HAP and 1.5 tons/month and 14.8 tons/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 source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA, the NESHAP for the Printing and Publishing Industry, 40 CFR 63 Subpart KK, and the NESHAP for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ.
  - 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).
- 12a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
  - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 13 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 13a. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures

specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.

- b. Pursuant to 35 Ill. Adm. Code 218.404(a), the VOM content of each coating and ink and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.404.
- 14. Pursuant to 40 CFR 60.445(d), the owner or operator of an affected facility operating at the conditions specified in 40 CFR 60.440(b) shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.
- 15. 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.
- 16a. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless

otherwise specified, for each coating line and maintain the information at the source for a period of three years:

- i. The names, identification number of each coating as applied on each coating line;
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
  - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(c)(2), the weight of VOM per weight of solids (or the weight of VOM per weight of coatings, as applicable) in each coating as applied each day on each coating line, and certified product data sheets for each coating.
- b. Pursuant to 35 Ill. Adm. Code 218.211(d)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.205 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:
- i. The name and identification number of each coating as applied on each coating line;
  - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
  - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(c)(2), the weight of VOM per weight of solids (or the weight of VOM per weight of coatings, as applicable) in each coating as applied each day on each coating line.
  - iv. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in 35 Ill. Adm. Code 218.104.
- c. Pursuant to 35 Ill. Adm. Code 218.211(g)(3), on and after a date consistent with 35 Ill. Adm. Code 218.106(e), or on and after the initial startup date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 218.218 shall comply with the following: Maintain at the source all records required by 35 Ill. Adm. Code 218.211(g) for a minimum of three years from the date the document was created and make those records available to the Illinois EPA upon request.

- d. Pursuant to 35 Ill. Adm. Code 218.404(b)(2), any owner or operator of a printing line which is exempted from any of the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402(a) on and after a date consistent with 35 Ill. Adm. Code 218.106, or, for flexographic or rotogravure printing lines that print flexible packaging or that print flexible packaging and non-flexible packaging on the same line, on and after January 1, 2012, the owner or operator of a flexographic and rotogravure printing line referenced in 35 Ill. Adm. Code 218.404(b) shall collect and record all of the following information each year for each printing line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating and ink as applied on each printing line.
  - ii. The VOM content and the volume of each coating and ink as applied each year on each printing line.
- 17a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. Names and amount of adhesives, coatings, inks and solvents used (ton/mo and ton/yr);
  - ii. VOM and HAP content of adhesives, coatings, inks and solvents used (wt. %);
  - iii. VOM and HAP input from the adhesives, coatings, inks and solvents to the process (ton/mo and ton/yr);
  - iv. Certified amount of waste solvent shipped off for disposal (ton/mo and ton/yr);
  - v. Certified VOM and HAP content of waste solvent shipped off for disposal (wt. fraction);
  - vi. Monthly and annual VOM and HAP emissions from the source with supporting calculations (ton/mo, ton/yr).
- 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 the Illinois EPA or USEPA request for records during the course of a source inspection.
- 18a. Pursuant to 35 Ill. Adm. Code 218.211(c)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following: On and after a date

consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:

- i. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
  - ii. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1), as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d), (e), or (i), as applicable.
- b. Pursuant to 35 Ill. Adm. Code 218.211(d)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 and complying by means of 35 Ill. Adm. Code 218.205 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
- i. Any record showing violation of 35 Ill. Adm. Code 218.205 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
  - ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code Part 218 Subpart F from 35 Ill. Adm. Code 218.205 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all as applicable of 35 Ill. Adm. Code 218.211(c)(1) or (e)(1), as applicable. Upon changing the method of compliance with 35 Ill. Adm. Code Part 218 Subpart F from 35 Ill. Adm. Code 218.205 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(c) or (e), as applicable.
- c. Pursuant to 35 Ill. Adm. Code 218.211(g)(2), on and after a date consistent with 35 Ill. Adm. Code 218.106(e), or on and after the initial startup date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 218.218 shall comply with the following: Notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.218 by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation.
- d. Pursuant to 35 Ill. Adm. Code 218.404(b)(3), any owner or operator of a printing line which is exempted from any of the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402(a) on and after a date consistent with 35 Ill. Adm. Code

218.106, or, for flexographic or rotogravure printing lines that print flexible packaging or that print flexible packaging and non-flexible packaging on the same line, on and after January 1, 2012, the owner or operator of a flexographic and rotogravure printing line exempted from the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402(a) shall notify the Illinois EPA of any record showing that total maximum theoretical emissions of VOM from all printing lines exceed 90.7 Mg (100 tons) in any calendar year before the application of capture systems and control devices, or that the combined potential to emit of all flexographic and rotogravure printing lines at the source equals or exceeds 22.7 Mg (25 tons) of VOM in any calendar year, by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs.

- e. Pursuant to 35 Ill. Adm. Code 218.404(g)(2), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401(d) shall Notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.401(d) by sending a description of the violation and copies of records documenting such violations to the Illinois EPA within 30 days following the occurrence of the violation.
- 19a. 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:

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

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If you have any questions on this, please call Valeriy Brodsky at 217/785-1705.

Raymond E. Pilapil  
Acting Manager, Permit Section  
Division of Air Pollution Control

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

EP:VJB:

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Masking Tape Manufacturing Plant, operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 100 tons/year of VOM, 10 tons/year for any single HAP and 25 tons/year for any combination of such HAP) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, coatings used and control measures are more effective than in this permit.

<u>Emission Units</u>	E M I S S I O N S (Tons/Year)		
	<u>VOM</u>	Single <u>HAP</u>	Combined <u>HAPs</u>
Coating and Printing Lines	14.8	7.9	14.8

VJB: