217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Clear Lam Packaging, Inc.
Attn: Mr. Robert J. Urry
1950 Pratt Boulevard
Elk Grove Village, Illinois 60007

Application No.: 01020035 I.D. No.: 031440AHX
Applicant's Designation: FLEXIBLPKG Date Received: February 15, 2001
Subject: Flexographic Press No. 10
Date Issued: April 16, 2001
Location: 1950 Pratt Boulevard, Elk Grove Village

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of one flexographic printing press (FP-10) controlled by existing regenerative thermal oxidizers as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.0 Unit Specific Conditions

1.1 Unit Flexographic Printing Press (FP-10)
Control Regenerative Thermal Oxidizer System

1.1.1 Description

The flexographic printing press is used to print on plastic films and paper substrates. The line is equipped with a natural gas fired dryer, permanent total enclosure, and is controlled by an existing thermal oxidation system.

1.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
FP-10	Flexographic Printing Press with Dryer	Regenerative Thermal Oxidizer System

1.1.3 Applicability Provisions and Applicable Regulations

a. The “affected press” for the purpose of these unit-specific conditions, is a press as described in conditions 1.1.1 and 1.1.2.

b. No owner or operator of a subject flexographic, packaging rotogravure or publication rotogravure printing line equipped with a capture system and control device shall operate the subject printing line unless the owner or operator meets the following requirements [35 IAC 218.401(c)]:

i. An incineration system is used which reduces the captured VOM emissions by at least 90 percent by weight;

ii. The printing line is equipped with a capture system and control device that provides an overall reduction in VOM emissions of at least:

A. 75 percent where a publication rotogravure printing line is employed.

B. 65 percent where a packaging rotogravure printing line is employed.

C. 60 percent where a flexographic printing line is employed.

iii. The control device is equipped with the applicable monitoring equipment specified in 35 IAC 218.105(d)(2) and except as provided in 35 IAC 218.105(d)(3), the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times the control device is in use;

iv. The capture system and control device are operated at all times when the subject printing line is in operation. The owner or operator shall demonstrate compliance with this subsection by using the applicable capture system and control device test methods and procedures specified in 35 IAC 218.105(c) through 218.105(f) and by complying with the recordkeeping and reporting requirements specified in 35 IAC 218.404(e).

1.1.4 Non-Applicability of Regulations of Concern

a. The affected press is not subject to 35 IAC Part 218, Subpart G, Use of Organic Material, because the affected press complying with 35 IAC Part 218, Subpart H, is not required to meet Subpart G [35 IAC 218.402(b)].

b. The affected press is not subject to 35 IAC 218.204(c), Coating Operations, Paper Coating, because the paper coating limitation does not apply to a line on which printing is performed which complies with the emission limitations in 35 IAC 218.401 [35 IAC 218.204(c)].

c. This permit is issued based on the affected press not being subject to the New Source Performance Standards (NSPS) for Publication Rotogravure Printing, 40 CFR Part 60, Subpart QQ, because the affected press does not meet the definition of a publication rotogravure printer.

d. This permit is issued based on the affected press not being subject to National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR Part 63, Subpart KK, because the affected press is not located at a major source for hazardous air pollutants.

1.1.5 Operational And Production Limits And Work Practices

a. Operation of the affected press shall not exceed the following limits:

Solvent VOM usage: 19,780 lb/month and 99 tons/yr
Ink VOM usage: 17,256 lb/month and 86 tons/yr

b. The capture system and afterburner on the affected press shall be operated to achieve 94% overall control of VOM.

c. The capture system on the affected press shall be designed, operated, and maintained to provide permanent total enclosure, in accordance with the criteria in 35 IAC 218, Appendix B, Procedure T. If the enclosure fails to meet USEPA's "Guidance on Addressing Capture Efficiency in Enforcing VOC SIP Regulations" the enclosure shall be upgraded. In no case shall the overall efficiency be less than 81%. It should be noted that Condition 1.1.5(b) requires the overall VOM control of the thermal oxidizers to be 94% which is greater than the applicable requirement of 81%.

d. Notwithstanding 35 IAC 218.106, seasonal shutdown of either thermal oxidizer from November 1 through March 31 of the following year is not allowed.

e. The thermal oxidizer's combustion chambers shall be preheated to the manufacturer's recommended temperature but not lower than 1400 degrees F, before the affected press has begun; this temperature shall be maintained during the printing process.

f. The dryers and thermal oxidizers for each affected press shall only use natural gas for fuel.

1.1.6 Emission Limitations

a. The affected press is subject to the following:

Emissions from the affected press shall not exceed the following limits:

VOM Emissions	
(Ton/Month)	(Ton/Year)
1.1	11.1

These limits are based on the maximum material usage and the minimum overall control efficiency.

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 (running 12 month total).

b. The source has addressed the applicability and compliance of 35 IAC Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules.

1.1.7 Testing Requirements

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 IAC 218.105 to establish the records required under 35 IAC Part 218 [35 IAC 218.404(a)].

1.1.8 Monitoring Requirements

The regenerative thermal oxidizer system shall be equipped with continuous monitoring device which is installed, calibrated, operated and maintained according to vendor specifications at all times the afterburner is in use. The monitoring device shall monitor the combustion chamber temperature of each afterburner [218.105(d)(2)].

1.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected press to demonstrate compliance with condition 1.1.6:

a. The owner or operator shall collect and record all of the following information each day for the affected press and maintain the information at the facility for a period of three years [35 IAC 218.404(e)(2)]:

i. Control device monitoring data;

ii. A log of the operating time for the capture system, control device, monitoring equipment and the associated printing line;

iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages;

b. Solvent VOM usage (lb/month and tons/year);

c. Ink VOM usage (lb/month and tons/year); and

d. VOM emissions (tons/month and tons/year).

1.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the affected press with the permit requirements as follows. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. Any record showing violation of 35 IAC 218.401(c), shall be reported by sending a copy of such record to the Agency within 30 days following the occurrence of the violation [35 IAC 218.404(e)(3)(A)].

b. At least 30 calendar days before changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(c) to 35 IAC 218.401(a) or (b), the owner or operator shall comply with all requirements of 35 IAC 218.404(c)(1) or (d)(1), respectively. Upon changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(c) to 35 IAC 218.401(a) or (b), the owner or operator shall comply with all requirements of 35 IAC 218.404(c) or (d), respectively [35 IAC 218.404(e)(3)(B)].

1.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected press without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee’s obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of inks or solvents at this source, provided that the Permittee continues to comply with the Conditions 1.1.3(b) and 1.1.6 of this permit;

1.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 1.1.9 and the emission factors and formulas listed below:

To determine compliance with Condition 1.1.6, emissions from the affected press shall be calculated based on the following:

VOM emissions = (material usage x VOM content of the material) x (1 - overall control efficiency of the control device)

2. The affected press may be operated for a period of 180 days under this construction permit.

Please note that the Permittee should seek to amend their CAAPP permit to include the construction and/or modification covered under this permit through the administrative amendment process by submitting an application that includes the information contained in form 273-CAAPP. This application must also identify and address any changes from the associated construction permit application. Note that information previously submitted in the construction permit application may be incorporated by reference into the updated information on fees as contained in form 292-CAAPP "Fee Determination for CAAPP Permit".

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

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

DES:JMS:psj

cc: Region 1