

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT--RENEWAL

PERMITTEE

N. Henry & Son, Inc.
Attn: Ben Wolf
6450 West Cortland Avenue
Chicago, Illinois 60707-4011

<u>Application No.:</u> 96090084	<u>I.D. No.:</u> 031600GAQ
<u>Applicant's Designation:</u>	<u>Date Received:</u> May 12, 2008
<u>Subject:</u> Screen Printing Facility	
<u>Date Issued:</u> May 20, 2009	<u>Expiration Date:</u> May 20, 2014
<u>Location:</u> 6450 West Cortland Avenue, Chicago, Cook County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of three screen printing lines 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/year for Volatile Organic Material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for any combination of such HAP). 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 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.
 - iii. 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 Part 218 Subpart PP (Miscellaneous Fabricated Product Manufacturing Processes) and 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units).
 - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- 2a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or

treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.

- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program,
3. Pursuant to 35 Ill. Adm. Code 218.301, now person shall cause or allow the discharge of more than 3.6 kg/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 only apply to photochemically reactive material.
4. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP.

Pursuant to 40 CFR 63.4481(c)(17), 40 CFR 63 Subpart PPPP does not apply to surface coating or a coating operation that meets any of the criteria of screen printing.

- 5a. Pursuant to 35 Ill. Adm. Code 218.204(c), the paper coating limitation shall not apply to any owner or operator of any paper coating line on which flexographic or rotogravure printing is performed if the paper coating line complies with the emissions limitations in 35 Ill. Adm. Code 218.401. In addition, screen printing on paper is not regulated as paper coating, but is regulated under 35 Ill. Adm. Code 218 Subpart TT.
 - b. This permit is issued based upon the plant not being subject to the VOM control requirements of 35 Ill. Adm. Code Part 218 Subpart PP (Miscellaneous Fabricated Product Manufacturing Processes) and 35 Ill. Adm. Code Part 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 sources.
- 6a. 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.
 - b. This permit is issued based on the source no longer using solvent based ink.
- 7a. Usage of raw materials and VOM emissions shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(lbs/Week)</u>	<u>(lbs/Year)</u>	<u>(lbs/Week)</u>	<u>(Tons/Year)</u>
UV Cured Inks	2,250	117,000	22.5	0.59
Solvents	880	45,760	880.0	<u>22.88</u>
			Total:	<u>23.47</u>

These limits are based on complete volatilization of the VOM contained in the materials, and the maximum material VOM usage.

- b. Note that there is a "nested" limit on the emissions of the combination of HAPs as a result of the limit on VOM emissions. The HAPs emitted at this source have been determined to be VOMs and therefore limiting VOM emissions also limits HAP emissions.
- c. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the source 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/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a CAAPP Permit from the Illinois EPA.

- d. Compliance with the annual limits of this permit shall be determined on a weekly basis from the sum of the data for the current week plus the preceding 51 weeks (running 52 week total).

- 8a. 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.

- 9a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Names and amounts of inks used (lbs/week and lbs/year);
 - ii. Names and amounts of solvents used (lbs/week and lbs/year);
 - iii. VOM usage in the inks and solvents (lbs/week and lbs/year); and
 - iv. Monthly and annual emissions of VOM and HAPs from the source with supporting calculations (lbs/week 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) 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.

10. 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 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.
- 11a. 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 Illinois EPA
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

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

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

Date Signed: _____

ECB:RWB:jws

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from screen printing facility 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 facility is limiting the usage of volatile organic material in the inks and solvent to 47,548 lbs per year. The resulting maximum emissions are well below the levels (e.g., 100 tons/yr for VOM, 10 tons/yr for any single HAP, and 25 tons/yr for any combination of such HAPs) 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 less material is handled and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)		
	<u>VOM</u>	<u>Single HAP</u>	<u>Total HAPs</u>
Three Screen Printing Lines	<u>23.47</u>	<u>9.0</u>	<u>22.50</u>
Totals	<u>23.47</u>	<u>9.0</u>	<u>22.50</u>

ECB:RWB:jws