

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - NESHAP SOURCE

PERMITTEE

Fort Dearborn Company
Flexible Packaging Division
Attn: Greg Grasso, General Manager
1500 Morse Avenue
Elk Grove Village, Illinois 60007

<u>Application No.:</u> 05050048	<u>I.D. No.:</u> 031440ALB
<u>Applicant's Designation:</u>	<u>Date Received:</u> May 16, 2005
<u>Subject:</u> Printing and Converting of Protective Packaging	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 1500 Morse Avenue, Elk Grove Village, Cook County, 60007	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of five (5) flexographic printing presses, two (2) edge seamers and four (4) natural gas-fired comfort heaters (less than 2.5 million Btu/hour) 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. This federally enforceable state operating permit (FESOP) is issued 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 any single Hazardous Air Pollutant (HAP) and 25 tons/year of 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 area source status under the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR Part 63, Subpart KK. This is accomplished through the establishment of federally enforceable production limitations on the usage of HAP at the facility, including materials used for source categories or purposes other than printing and publishing, to less than 10 tons/year for any individual HAP and 25 tons/year of any combination of such HAPs.
 - iii. 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 requirements of 35 Ill. Adm. Code Part 205, Emissions 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).
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. The wide-web flexographic printing presses as this source are subject to a National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A and KK. The Illinois EPA is administering the NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 63.820(a)(2), each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated for which the owner or operator chooses to commit to and meets the criteria of 40 CFR 63.820(a)(2)(i) and (ii) for purposes of establishing the facility to be an area source of HAP with respect to 40 CFR 63 Subpart KK. A facility which establishes area source status through some other mechanism, as described in 40 CFR 63.820(a)(7), is not subject to the provisions of 40 CFR 63 Subpart KK.
 - i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
 - ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.
- c. Pursuant to 40 CFR 63.820(a)(3), each facility for which the owner or operator chooses to commit to and meets the criteria stated in 40 CFR 63.820(a)(2) shall be considered an area source, and is subject only to the provisions of 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).
- d. Pursuant to 40 CFR 63.820(a)(4), each facility for which the owner or operator commits to the conditions in 40 CFR 63.820(a)(2) may exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion).
- e. Pursuant to 40 CFR 63.820(a)(5), each facility for which the owner or operator commits to the conditions in 40 CFR 63.820(a)(2) to become an

area source, but subsequently exceeds either of the thresholds in 40 CFR 63.820(a)(2) for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, each such facility would be subject to the provisions of 40 CFR 63 Subpart KK as noted in 40 CFR 63.820(a)(1) and would no longer be eligible to use the provisions of 40 CFR 63.820(a)(2), even if in subsequent 12-month periods the facility uses less HAP than the thresholds in 40 CFR 63.820(a)(2).

- f. Pursuant to 40 CFR 63.820(a)(6), an owner or operator of an affected source subject to 40 CFR 63.820(a)(2) who chooses to no longer be subject to 40 CFR 63.820(a)(2) shall notify the Illinois EPA or USEPA of such change. If, by no longer being subject to 40 CFR 63.820(a)(2), the facility at which the affected source is located becomes a major source:
 - i. The owner or operator of an existing source must continue to comply with the HAP usage provisions of 40 CFR 63.820(a)(2) until the source is in compliance with all relevant requirements for existing affected sources under 40 CFR 63 Subpart KK;
 - ii. The owner or operator of a new source must continue to comply with the HAP usage provisions of 40 CFR 63.820(a)(2) until the source is in compliance with all relevant requirements for new affected sources under 40 CFR 63 Subpart KK.
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. 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.

- d. 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.
- e. 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.
- f. 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 the 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
 - v. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- g. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.

- h. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- 4. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.
- 5a. Pursuant to 35 Ill. Adm. Code 218.204(c), 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 the VOM content exceeds the following emission limitations for Paper Coating. 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 218 Subpart F 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. The emission limitations are as follows:

	kg/l	lb/gal
Paper Coating	0.28	(2.3)

Note: 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.

- b. Pursuant to 35 Ill. Adm. Code 218.301, no 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 apply only to photochemically reactive material.
- 6. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required 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 218.209, 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 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.
- b. This permit is issued based upon the source not being subject to the 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 from this facility to less than 100 tons per year and the potential to emit for VOM emissions to less than 25 tons per year.
- 8a. 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.
- b. The comfort heaters shall only be operated with natural gas as the fuel. The use of any other fuel in the comfort heaters requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- 9a. Emissions and operation from all flexographic printing presses and seamers shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Inks, Coatings and Adhesives	1.24	14.9	1.24	14.9
Wash/Cleanup Solvents	0.42	5.0	0.42	5.0
			Totals	19.9

These limits are based on the maximum material usage and the maximum VOM content.

- b. Emissions and operation of the HP digital press with coater shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Inks, Coatings and Adhesives	740	3.68	740	3.68
Solvents	10	0.05	10	0.05
			Totals	3.73

These limits are based on the maximum material usage and the maximum VOM content.

- c. The VOM emissions shall be calculated using the following equations:

$$E = \sum (I_i \times V_{Ii}) + \sum (FS_j \times V_{FSj}) + \sum (CS_k \times V_{CSk})$$

Where:

E = VOM emissions (tons);

I_i = Ink and coating usage (tons);

V_{Ii} = VOM content of ink or coating (weight fraction);

FS_j = Adhesive usage (tons);

V_{FSj} = VOM content of adhesive (weight fraction);

CS_k = Cleaning solution usage (tons); and

V_{CSk} = VOM content of cleaning solution (weight fraction).

- d. Operation and emissions of the 4 natural gas fired combustion comfort heaters shall not exceed the following limits:

i. Natural Gas Usage: 7.2 mmscf/month and 72 mmscf/year

ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
	<u>(Lbs/mmscf)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Carbon Monoxide (CO)	84	0.30	3.02
Nitrogen Oxides (NO _x)	100	0.36	3.60
Particulate Matter (PM)	7.6	0.03	0.27
Volatile Organic Material (VOM)	5.5	0.02	0.20
Sulfur Dioxide (SO ₂)	0.6	0.01	0.02

These limits are based on the maximum natural gas usage and standard emission factors (Tables 1.4-1 and 1.4-2 or AP-42, Volume I, Fifth Edition, Supplement D, July 1998).

- e. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.8 tons/month and 8.0 tons/year of any single HAP and 1.99 tons/month and 19.9 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.

- f. 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).
- 10a. 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 Conditions 11 and 12 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 11. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 12a. 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.
13. 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.
14. Pursuant to 40 CFR 63.829(d), the owner or operator of each facility which commits to the criteria of 40 CFR 63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.
15. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.

- 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 of and complying by means of 35 Ill. Adm. Code 218.204 shall collect and record following information each day 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 the coating lines.
 - 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 the coating lines.
- b. Pursuant to 35 Ill. Adm. Code 218.404(b)(2), any owner or operator of a printing line which is exempted from the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402 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 day 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. Total usage of each ink, coating, cleaning solvents, and any other VOM containing materials (pounds per month and tons per year);
 - ii. The VOM content of each ink, coating, cleaning solvents, and any other VOM containing materials used with basis, accompanied by a copy of the supporting information (e.g., supplier data sheet or laboratory analysis report), (% VOM by weight); and
 - iii. Natural gas usage (mmscf/month and mmscf/year); and
 - iv. Monthly and annual emissions of CO, NO_x, PM, SO₂, VOM and HAPs from the source 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.

18. Pursuant to 40 CFR 63.830(b)(6)(ii), each owner or operator of an affected source subject to 40 CFR 63 Subpart KK shall submit to the Illinois EPA or USEPA A summary report specified in 40 CFR 63.10(e)(3) shall be submitted on a semi-annual basis (i.e., once every 6-month period). These summary reports are required even if the affected source does not have any control devices or does not take the performance of any control devices into account in demonstrating compliance with the emission limitations in 40 CFR 63.824 or 40 CFR 63.825. In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i), the summary report shall include exceedances of either of the criteria of 40 CFR 63.820(a)(2).
19. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 20a. 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 of and complying by means of 35 Ill. Adm. Code 218.204 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), respectively. 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) or (e), respectively.
- b. Pursuant to 35 Ill. Adm. Code 218.404(b)(3), any owner or operator of a printing line exempted from the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402 shall notify the Illinois EPA of any record showing that total maximum theoretical emissions of VOM from all printing lines exceeds 90.7 Mg (100 tons) in any calendar year before the application of capture systems and control devices by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs.
- 21a. 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 or 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

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:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the printing 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 per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled 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)						Single <u>HAP</u>	Total <u>HAPs</u>
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>			
Flexographic Printing Presses and Seamers					19.90			
HP Digital Press					3.73			
Combustion Heaters	<u>3.02</u>	<u>3.60</u>	<u>0.27</u>	<u>0.02</u>	<u>0.20</u>	----	----	
Totals	<u>3.02</u>	<u>3.60</u>	<u>0.27</u>	<u>0.02</u>	<u>23.83</u>	<u>8.0</u>	<u>19.9</u>	

DWH:psj