

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

General Packaging Products, Inc.  
Attn: Joseph A. Bunch, Vice President, Operations  
1700 South Canal Street  
Chicago, Illinois 60616

<u>Application No.:</u> 95050166	<u>I.D. No.:</u> 031600BTT
<u>Applicant's Designation:</u>	<u>Date Received:</u> July 19, 2002
<u>Subject:</u> Printing and Converting of Protective Packaging	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 1700 South Canal Street, Chicago, Cook County, 60616	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of W15 Klingrove Company Rotogravure printing press, W16 Wolverine Manufacturing Company flexographic printing press, W17 Kidder-Stacy flexographic printing press, 6/c CI flexographic printing press, W19 flexographic printing press, W35 Kidder-Stacy flexographic printing press, W14 flexographic printing press, W18 flexographic printing press, paper slitters and trim blower system, roll doctors and trim blower system 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 VOM, 10 tons/year for a single 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. This permit is issued based upon the source not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR Part 63, Subpart KK. This is consequence of the 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.

- iii. To limit emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205, except reporting requirements of 35 Ill. Adm. Code 205.300.
  - 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. 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 the requirements of 35 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 Ill. Adm. Code 212.301 and 212.314.
  - c. 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.
- All normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads 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.
- d. 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 this Subpart, 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.
- e. 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 subsection (c) of 35 Ill. Adm. Code 212.321.
3. 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.
- 4a. Pursuant to 35 Ill. Adm. Code 218.401(a), now owner or operator of a subject flexographic packaging rotogravure or publication rotogravure printing line shall apply at any time any coating or ink unless the VOM content does not exceed the limitation specified in either 35 Ill. Adm. Code 218.401(a)(1) or (a)(2). Compliance with this 35 Ill. Adm. Code 218.401 must be demonstrated through the applicable coating or ink 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 218.404(c). As an alternative to compliance with 35 Ill. Adm. Code 218.401(a), a subject printing line may meet the requirements of 35 Ill. Adm. Code 218.401(b) or (c).
- i. Forty percent VOM by volume of the coating and ink (minus water and any compounds which are specifically exempted from the definition of VOM); or

- ii. Twenty-five percent VOM by volume of the volatile content in the coating and ink.
  
- b. Pursuant to 35 Ill. Adm. Code 218.401(b), no owner or operator of a subject flexographic, packaging rotogravure or publication rotogravure printing line shall apply coatings or inks on the subject printing line unless the weighted average, by volume, VOM content of all coatings and inks as applied each day on the subject printing line does not exceed the limitation specified in either 35 Ill. Adm. Code 218.401(a)(1) (as determined by 35 Ill. Adm. Code 218.401(b)(1)) or 35 Ill. Adm. Code 218.401(a)(2) (as determined by 35 Ill. Adm. Code 218.401(b)(2)). Compliance with 35 Ill. Adm. Code 218.401(b) must be demonstrated through the applicable coating or ink 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 218.404(d).
  - i. The following equation shall be used to determine if the weighted average VOM content of all coatings and inks as applied each day on the subject printing line exceeds the limitation specified in 35 Ill. Adm. Code 218.401(a)(1).

$$VOM_{(i)(A)} = \frac{\sum_{i=1}^n C_i L_i (V_{si} + V_{VOM_i})}{\sum_{i=1}^n (V_{si} + V_{VOM_i})}$$

Where:

- $VOM_{(i)(A)}$  = The weighted average VOM content in units of percent VOM by volume of all coatings and inks as applied each day on the subject printing line exceeds the limitation specified in 35 Ill. Adm. Code 218.401(a)(1).
  
- $i$  = Subscript denoting a specific coating or ink as applied;
  
- $n$  = The number of different coatings and/or inks as applied each day on a printing line;
  
- $C_i$  = The VOM content in units of percent VOM by volume of each coating or ink as applied (minus water and any compounds which are specifically exempted from the definition of VOM);
  
- $L_i$  = The liquid volume of each coating or ink as applied in units of liters (gallons);

$V_{si}$  = The volume fraction of solids in each coating or ink as applied; and

$V_{VOMi}$  = The volume fraction of VOM in each coating or ink as applied.

- ii. The following equation shall be used to determine if the weighted average VOM content of all coatings and inks as applied each day on the subject printing line exceeds the limitation specified in 35 Ill. Adm. Code 218.401(a)(2).

$$VOM_{(i)(B)} = \frac{\sum_{i=1}^n C_i L_i V_{vmi}}{\sum_{i=1}^n L_i V_{vmi}}$$

Where:

$VOM_{(i)(B)}$  = The weighted average VOM content in units of percent VOM by volume of the volatile content of all coatings and inks used each day;

$I$  = Subscript denoting a specific coating or ink as applied;

$n$  = The number of different coatings and/or ink as applied each day on each printing line;

$C_I$  = The VOM content in units of percent VOM by volume of the volatile matter in each coating or ink as applied;

$L_I$  = The liquid volume of each coating or ink as applied in units of liters (gallons); and

$V_{vmi}$  = The volume fraction of volatile matter in each coating or ink as applied.

- c. 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.
- d. 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.

- e. In the event that the operation of this emission unit 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. Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205.
- b. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and beginning with the following seasonal allotment period, shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period.
- 6a. Emissions and operation of Printing Line W19 shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>	<u>(% by Weight)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Low VOM Ink	6,510	39.06	6.0	390.6	2.34
High VOM Ink	6,510	39.06	12.0	781.2	4.69
Clean-Up Solvent	456	2.76	100.0	<u>456.0</u>	<u>2.76</u>
				Total	<u>9.79</u>

These limits are based on the maximum actual emissions resulting from the maximum actual ink and clean-up solvent usage and the maximum VOM contents in the inks and clean-up solvent. The above limitations were established in Construction Permit 96050035, pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that the construction/modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 Ill. Adm. Code Part 203.

- b. Emissions and operation of Printing Line W35 shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>	<u>(% by Weight)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Low VOM Ink	16,056	96.336	6.0	----	----
High VOM Ink	8,028	48.168	12.0	----	----
			Total	<u>963.3</u>	<u>5.78</u>

These limits are based on the maximum actual emissions resulting from the maximum actual ink usage and the maximum VOM content of the inks. The above limitations were established in Construction Permit 97010077,

pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that the construction/modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 Ill. Adm. Code Part 203.

- c. Emissions of VOM from the W17 6-color CI Flexo Press #3 with wax module shall not exceed the following limits:

<u>(Tons/Month)</u>	VOM Emissions	<u>(Tons/Year)</u>
0.6		5.78

These limits are based on maximum actual emissions resulting from the maximum actual ink usage and the maximum VOM contents of the inks. The above limitations were established in Construction Permit 97100055 pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that the construction/modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 Ill. Adm. Code Part 203.

- d. Emissions and operation of Printing Lines W15 and W16 shall not exceed the following limits:

<u>Material</u>	Ink Usage		VOM Emissions	
	<u>(Lbs/Month)</u>	<u>(Tons/Year)</u>	<u>(Lbs/Month)</u>	<u>(Tons/Year)</u>
Ink	48,000	235	3,600	17.0

These limits are based on maximum operation and material balance.

- e. Emissions and operation of Printing Press W-18 shall not exceed the following limits:

<u>Material</u>	Material Usage		VOM Content	VOM Emissions	
	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>	<u>(% by Weight)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Coatings and Inks	11,500	69.0	8.0	920	5.52
Cleanup Solvent	250	1.5	100.0	<u>250</u>	<u>1.50</u>
			Totals	1170	7.02

These limits are based on the maximum usage of inks and solvents, the maximum VOM content of these materials, and the maximum actual emission rates. The above limitations were established in Construction Permit 93120039, pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that the construction/modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 Ill. Adm. Code Part 203.

- f. Emissions and Operation of Printing Press W-14 shall not exceed the following limits:

Throughput of Inks and Cleaning Materials		VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
5.0	50.0	0.58	5.78

The above limitations were established in Construction Permit 02060065, pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that the construction/modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 Ill. Adm. Code Part 203.

- g. This permit is issued based on negligible emissions of particulate matter from the paper slitters and trim blower system. For this purpose, emissions from this unit shall not exceed nominal emission rates of 0.44 tons/year.
- h. This permit is issued based on negligible emissions of particulate matter from the roll doctors and trim blower system. For this purpose, emissions from this unit shall not exceed nominal emission rates of 0.44 tons/year.
- i. This permit is issued based on negligible emissions of VOM from the polyglycerol coating. For this purpose, emissions from the use of this coating shall not exceed nominal emission rates of 0.44 tons/year.
- j. Operation and emissions of the natural gas fired combustion equipment shall not exceed the following limits:
  - i. Natural Gas Usage: 7.2 mmscf/month and 72 mmscf/year
  - ii. Emissions of nitrogen oxide (NO<sub>x</sub>), carbon monoxide (CO), particulate matter (PM), volatile organic material (VOM), and sulfur dioxide (SO<sub>2</sub>):

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

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

- j. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or 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, or such lesser quantity as

USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. 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.

- k. 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).
- 7a. Pursuant to 35 Ill. Adm. Code 212.107, 212.109, and 212.110, testing for particulate matter emissions shall be performed as follows:
  - i. For both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR Part 60, Appendix A, incorporated by reference in 35 Ill. Adm. Code 212.113, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This Condition shall not apply to 35 Ill. Adm. Code 212.301, pursuant to 35 Ill. Adm. Code 212.107.
  - ii. Except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, incorporated by reference in 35 Ill. Adm. Code 212.113, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged, pursuant to 35 Ill. Adm. Code 212.109.
  - iii. Measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR Part 60, Appendix A, Methods 5, 5A, 5D, or 5E, pursuant to 35 Ill. Adm. Code 212.110(a).
  - iv. The volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4, pursuant to 35 Ill. Adm. Code 212.110(b).
  - v. Upon 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, pursuant to 35 Ill. Adm. Code 212.110(c).

- b. Testing required by Condition 7(a) shall be performed by a qualified independent testing service.
- 8. 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.
- 9a. 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.
- b. 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.
- c. Pursuant to 35 Ill. Adm. Code 218.404(d)(2), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401

and complying by means of 35 Ill. Adm. Code 218.401(b) shall collect and record all of the following information each day 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.
  - iii. The daily-weighted average VOM content of all coatings and inks as applied on each printing line.
- d. 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 on a monthly and annual basis in terms of pounds per month and tons per year;
  - ii. The VOM content of each ink, coating, cleaning solvents, and any other VOM containing materials used in terms of % VOM by weight with basis, accompanied by a copy of the supporting information, e.g., supplier data sheet or laboratory analysis report; and
  - iii. Total VOM emissions from printing lines; and
  - iv. Monthly and annual emissions of CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAPs with supporting calculations (tons/month and tons/year).
- e. The Permittee shall maintain the following records to determine compliance with the 15 tons VOM/ozone season limitation specified in Condition 5:
- i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
  - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in this permit; and
  - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.
10. 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 an Illinois EPA or USEPA request for records during the course of a source inspection.

- 11a. 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.
- b. Pursuant to 35 Ill. Adm. Code 218.404(d)(3), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(b) shall notify the Illinois EPA in the following instances:
  - i. Any record showing violation of 35 Ill. Adm. Code 218.401(b) 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 218.401(b) to 35 Ill. Adm. Code 218.401(a) or 35 Ill. Adm. Code 218.401(c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(c)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(b) to 35 Ill. Adm. Code 218.401(a) or (c), the owner or operator shall comply with the requirements of 35 Ill. Adm. Code 215.404(c) or (e).
12. 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 David Hulskotter at 217/782-2113.

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

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

ECB:DWH:jws

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	Total
	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>	<u>HAP</u>	<u>HAPs</u>
Flexographic							
Printing Press W19					9.79		
Flexographic							
Printing Press W18					7.02		
Flexographic							
Printing Press W35					5.78		
W17 6-Color CI Flexo							
Press #3					5.78		
Printing Presses							
W15 and W16					17.00		
Flexographic					5.78		
Printing Press W14							
Paper Slitters &							
Trim Blower System			0.44				
Roll Doctors and							
Trim Blower System			0.44				
Fuel Combustion	3.02	3.60	0.27	0.02	0.20		
Polyglycerol Coating					<u>0.44</u>		
Totals	3.02	3.60	1.15	0.02	<u>51.79</u>	9.0	22.5

DWH:jws

Attachment B - Emissions Reduction Market System (ERMS)

1. Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' FESOP or CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 Ill. Adm. Code 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 Ill. Adm. Code 205.500 and 35 Ill. Adm. Code 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 Ill. Adm. Code 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 Ill. Adm. Code 205.630).

2. Applicability

Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons, not including VOM emissions from insignificant emission units and activities. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part

205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205.

3. Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to determine compliance with the above limitation:
  - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
  - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures, which may be specified in this permit; and
  - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.
- b. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by October 31 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 Ill. Adm. Code 205.205(b) and 35 Ill. Adm. Code 205.300.
- c. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and beginning with the following seasonal allotment period, shall immediately comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during the first seasonal allotment period it exceed 15 tons and each seasonal allotment period, thereafter, pursuant to 35 Ill. Adm. Code 205.150(c).