

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Videojet Technologies, Inc. for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
Non-Contact Inkjet Unit Assembly and Testing
Wood Dale, Illinois

Site Identification No.: 043800AAL
Application No.: 91070095

Schedule

Public Comment Period Begins: June 16, 2007

Public Comment Period Closes: July 16, 2007

Illinois EPA Contacts

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I. INTRODUCTION

Videojet Technologies, Inc. has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its non-contact inkjet unit assembly and testing in Wood Dale. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before renewing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

II. SOURCE DESCRIPTION

Videojet Technologies, Inc. is located at 1500 Mittel Drive, Wood Dale. The printing equipment manufactured at Videojet is tested by various groups of employees. The Engineers test to insure new products work within design specification. The employees test some printers before leaving the line to verify specification. These engineers run tests to insure new products work within design specification. They test some printer before leaving the line to verify specification. These tests utilize ink and makeup solutions to print, and then cleaning solution is used for cleanup. Used inks, makeup solution, and cleaning solution is collected in drums and shipped offsite.

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has been operating this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The board has standards for sources of Volatile

Organic Material (VOM) emission. The application shows that the plant is in compliance with applicable state emission standards.

The principal air contaminant of concern for the facility is VOM from the organic solvents in the paints. The solvents are a vital component of inks which allows the proper application of inks solids through the application equipment. Videojet Technologies, Inc. uses several types of inks, makeup solution and cleaning solution with different amounts of VOM in each gallon. Each type has a usage and VOM content limits which total to less than 100 ton/yr. Cleaning solvent, also a VOM is also limited. Some of the VOMs are HAPs. HAP limits are based on actual emissions.

This permit will be issued based on the source 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 consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year from the subject emission units.

V. CONTENTS OF THE PERMIT

The renewed permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant. As explained, the two spray booths are subject to rule 35 Ill. Adm. Code 218.301, which requires 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 source. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit would also set limitations on (the minimum control efficiency and the amount of inks and cleaning solution used at this facility. These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions would also continue to require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to renew the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.