

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Solar Communications, Inc.
Attn: Anthony Antonellis
1120 Frontenac Road
Naperville, Illinois 60563

Application No.: 91120053
Applicant's Designation: FLEXOPLANT
Subject: Flexographic Printing Plant
Date Issued: October 6, 2000
Location: 1500 Shore Road, Naperville

I.D. No.: 043065ACR
Date Received: July 25, 2000
Expiration Date: September 22, 2002

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of two flexographic printing presses controlled by catalytic afterburner and one uncontrolled flexographic printing press 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 to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAP). As a result, the source is excluded from the requirement 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.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
2. This permit is issued based upon the plant being subject to the VOM control requirements of 35 Ill. Adm. Code Subpart H: "Flexographic and Rotogravure Printing". Compliance with Subpart H is achieved by utilizing a catalytic afterburner which meets the requirements of Section 218.401(c)(2) and (c)(4)(C) on two controlled presses and use of compliance inks on uncontrolled press.
- 3a. Total combined emissions of VOM from printing and clean-up operations shall not exceed the following limits:

3.0 tons/month; 20.0 tons/year.
- b. The emissions of VOM shall be determined from the following equation on

a monthly basis:

$$E = [3(I_i \times C_i) \times (1 - CE \times DE) + (3(I_q \times C_q) + 3(S_j \times C_j) - 3(W_p \times C_p)] / 2,000$$

Where:

- E - VOM emissions (tons/month);
- I_i - ink usage of each type on the controlled presses (gal/month);
- C_i - VOM content in the ink of each type, as applied on the controlled presses (lb/gal);
- I_q - ink usage of each type on the uncontrolled press (gal/month);
- C_q - VOM content in the ink of each type, as applied on the uncontrolled press (lb/gal);
- S_j - clean-up solvent usage of each type (gal/month);
- C_j - VOM content of the clean-up solvent of each type (lb/gal);
- W_p - certified amount of waste shipped off for disposal (gal/month);
- C_p - certified VOM content of the waste (lb/gal);
- CE* - capture efficiency of the control system, decimal fraction;
- DE* - destruction efficiency of the control system, decimal fraction.

*Values of CE and DE shall not exceed those obtained during the most recent stack test.

- c. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.
- d. Organic HAP emissions shall be calculated using the equation in Condition 3(b) substituting VOM content with HAP content.
- e. 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.
- 4. The catalytic afterburner shall be in operation at all times that at least one printing line is in operation.
- 5a. The catalytic afterburner shall be equipped with a USEPA approved continuous monitor that will measure the temperature rise across each catalytic afterburner bed or VOM concentration of exhaust. It shall be installed, calibrated, maintained and operated according to vendor specifications at all times the afterburner is in use.
- b. If the catalytic afterburner is equipped with a continuous monitoring device which measures the temperature rise across the catalytic bed then, the temperature before the catalytic bed shall not be below the average temperature immediately before the catalytic bed measured during the most recent stack test that demonstrated that the operation was in compliance.

6. The Permittee shall maintain daily records of the following items:
 - a. Names of inks used and their VOM content, as applied (lb/gal) separately for controlled and uncontrolled presses.
 - b. Control device monitoring data.

- c. A log of operating time for the capture system, control device, monitoring equipment and the associated printing line.
 - d. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
7. The Permittee shall maintain monthly records of the following items:
- a. Names and amounts of inks used (gal/mo) and their VOM and HAP content, as applied separately for controlled and uncontrolled presses (lb/gal).
 - b. Names and amounts of solvents used for the ink dilution (gal/mo) and their VOM and HAP content (lb/gal).
 - c. Names and amounts of solvents used for clean-up (gal/mo) and their VOM and HAP content (lb/gal).
 - d. VOM and HAP emissions for preceding month (tons/month) and preceding 12 months (tons/year).
8. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three 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.
9. If there is an exceedance of 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. The report shall include the emissions released, a copy of the relevant records, and a description of the exceedance or violation, and efforts to reduce emissions and future occurrences.
10. The Permittee shall submit the following additional information from the prior calendar year, along with the Annual Emissions Report, due May 1st of each year: names and amounts of inks and solvents used (gal/year) and their VOM and HAP content (lb/gal).
11. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, IL 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Page 4

Illinois Environmental Protection Agency
Division of Air Pollution Control - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

It should be noted that this permit has been revised to reflect a replacement of one controlled printing press with uncontrolled one described in construction permit 00070070 without any increase in VOM and HAP emissions. This revision does not relax monitoring, recordkeeping, or reporting requirements contained in federally enforceable conditions of this permit. These permit conditions assure that this source would not be a major source for purpose of CAAPP.

If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

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

DES:VJB:psj

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the 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 resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled HAP, 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 material is handled, and control measures are more effective than required in this permit.

1. Total combined emissions of VOM from printing and clean-up operations shall not exceed the following limits:

3.0 tons/month; 20.0 tons/year.

2. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.

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