

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Smurfit Laminations  
Attn: Edward Richrath  
850 Lunt Avenue  
Elk Grove Village, Illinois 60007

Application No.: 73031073                      I.D. No.: 031440AHG  
Applicant's Designation:                      Date Received: April 20, 2000  
Subject: Printing/ Laminating Presses  
Date Issued:                                      Expiration Date:  
Location: 850 Lunt Avenue, Elk Grove Village

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of three rotogravure printing/ coating/laminating presses 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 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.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits for this location.
- 2a. This permit is issued based upon the rotogravure printing/coating presses not being subject to the VOM control requirements of 35 Ill. Adm. Code Part 218 Subpart H: Printing and Publishing, Section 218.401: Flexographic and Rotogravure Printing. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit of VOM to less than 25 tons per year from the subject sources.
- b. The paper coating operations performed on the printing/coating presses shall comply with VOM content limitations either Section 218.401 - forty percent by volume of the coating or twenty-five percent by volume of the volatile content in the coating or Section 218.204(c) - 2.3 lb/gal of coating.

3. The VOM emissions from three printing/coating/laminating presses (combined) shall not exceed the following limits: 3.5 ton/mo, 20 ton/yr.

The VOM emissions shall be determined from the following equation on a monthly basis:

$$3(M_i \times C_i) - 3(W_j \times C_j) \quad \text{Where:}$$

$M_i$  - VOM-containing raw material usage (gal/month);

$C_i$  - VOM content of the raw material (lb/gal);

$W_j$  - waste material shipped off-site (gal/month);

$C_j$  - VOM content of the waste material (lb/gal).

These limits define the potential emissions of the VOM and are based on the maximum actual emissions determined from the maximum production capacity and VOM content of raw materials. 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 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.
5. The Permittee shall maintain monthly records of the following items:
  - a. Names and amounts of inks, coatings, clean-up solvents and other VOM containing materials used (tons/mo, tons/yr);
  - b. VOM and HAP content of materials in item (a)(wt %);
  - c. VOM and HAP emission calculations (ton/mo, tons/yr);
6. 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 and 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 request for records during the course of a source inspection.

7. 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 in accordance with the recordkeeping requirements, a copy of the relevant records, a description of the exceedances or violation, and efforts to reduce emissions and future occurrences.
  
8. The Permittee shall submit the following additional information with the Annual Emission Report, due May 1st of each year: annual ink usage, coating usage, clean up solvent usage, etc., from the prior calendar year. If there have been no exceedances during the previous calendar year the Annual Emission Report shall include a statement to that effect.

It should be noted that the air heaters and dryers with firing rates less than 10 mmbtu/hr are exempt from state permit requirements pursuant to 35 Ill. Adm. Code 201.146(d) and (fff), respectively.

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

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

DES:VJB

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/Laminating 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. This is use of 20.0 tons of volatile organic materials in inks, adhesives, coatings and clean-up solvents per year. 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. The VOM emissions from three printing/laminating presses (combined) shall not exceed the following limits: 3.5 ton/mo, 20 ton/yr.

The VOM emissions shall be determined from the following equation on a monthly basis:

$$3(M_i \times C_i) - 3(W_j \times C_j) \quad \text{Where:}$$

$M_i$  - VOM-containing raw material usage (gal/month);

$C_i$  - VOM content of the raw material (lb/gal);

$W_j$  - waste material shipped off-site (gal/month);

$C_j$  - VOM content of the waste material (lb/gal).

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.

VJB: