

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
RR Donnelley - Kirk Road for a
Federally Enforceable State Operating Permit (FESOP)
for 609 S. Kirk Road
St. Charles, IL 60174

Site Identification No.: 089483ADJ
Application No.: 12040046

Illinois EPA Contacts
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I. INTRODUCTION

RR Donnelley has applied for a Federally Enforceable State Operating Permit (FESOP) for its commercial lithographic printing facility at 609 South Kirk Road in St. Charles. 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 permit that it would propose to issue for the plant. However, before issuing 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

This printing facility first received a construction permit for printing presses from the Illinois EPA in 2011. A printing facility uses ink, solvents, and chemical solutions in various printing presses to produce customer specific graphic arts. Printing may be performed on various coated or uncoated paper stock. All printing presses have in common the application of solvent based inks and chemical solutions to the surface of moving material and the evaporation of the solvent exhausted from the system.

This printing facility utilizes nonheatset web offset lithographic presses for the printing. Also digital presses are being used at the commercial lithographic printing plant.

The emissions of volatile organic material (VOM) resulting from the use of lithographic printing-related materials and coating materials such as lithographic inks, fountain solution additives, coatings and cleaning solvents. These materials contain organic solvents which are emitted to the atmosphere during their use. To minimize VOM losses from manual press cleaning operations, a manual blanket wash cleaning solvent is used that has a low VOM composite partial vapor pressure (<10 mmHg at 20°C). In addition, all cleaning materials, including the used cleaning towels, are stored in closed containers at all times they are not in use.

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 applied for 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 not 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 of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

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 specific standards for units emitting volatile organic material in the greater Chicago Area. The printing operation at RR Donnelley is regulated by 35 Ill. Adm. Code 218.407. These regulations require the fountain solution to be five percent VOM by volume or less. Cleaning solutions used on any lithographic printing lines are required to be thirty percent VOM or less or they are required to have a low VOM composite partial vapor pressure less than 10 mmHg at 20°C (68°F). The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

V. CONTENTS OF THE PERMIT

This permit that the Illinois EPA is proposing, will identify the specific emission standards that apply to the emission units at the plant. 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 conditions would also 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 that 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 issuance of its permit. The Illinois EPA is therefore proposing to issue 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.