

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Meyercord Revenue Company  
Attn: Irma Hrycyk  
475 Village Drive  
Carol Stream, Illinois 60188

<u>Application No.:</u> 01050092	<u>I.D. No.:</u> 043020ACH
<u>Applicant's Designation:</u> REVENUE-01	<u>Date Received:</u> March 7, 2008
<u>Subject:</u> Tax Stamp Printing	
<u>Date Issued:</u> July 1, 2014	<u>Expiration Date:</u> July 1, 2024
<u>Location:</u> 475 Village Drive, Carol Stream, DuPage County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

One (1) Rotogravure Press with Dryer;  
Three (3) Ink-Jet Printers;  
Ink Mixing Operation; and  
Natural Gas-Fired Combustion Units

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. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single hazardous air pollutant (HAP) and 25 tons/year for any combination of such HAPs). 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.
  - ii. To limit the emissions of volatile organic material from the source to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
  - iii. To establish federally enforceable production and operating limitations, which restrict the potential to emit for VOM to less than 25 tons per year so that the source is not subject to the requirements of 35 Ill. Adm. Code 218.401 (Flexographic and Rotogravure Printing), 35 Ill. Adm. Code Part 218 Subpart AA (Paint and Ink Manufacturing), and 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units).

- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
  - c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012 except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations which use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;
- b. Pursuant to 35 Ill. Adm. Code 218.187(b), no owner or operator of a source subject to 35 Ill. Adm. Code 218.187, other than manufacturers of coatings, inks, adhesives, or resins, shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in 35 Ill. Adm. Code 218.187(b)(1), (b)(2), or (b)(3).
    - i. The VOM content of the as-used cleaning solutions (minus water and any compounds that are specifically exempted from the definitions of VOM) does not exceed the following emissions limitations:
      - A. Cleaning of ink application equipment:

	<u>kg/l</u>	<u>lb/gal</u>
Rotogravure printing that does not print flexible packaging	0.10	0.83
      - B. All other cleaning operations not subject to a specific limitation in 35 Ill. Adm. Code 218.187(b)(1)(A) through (b)(1)(C)

	0.050	0.42
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    - ii. The composite vapor pressure of each as-used cleaning solution used does not exceed 8.0 mmHg measured at 20°C (68°F);
  - c. Pursuant to 35 Ill. Adm. Code 218.204(c), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Paper Coating. Except as otherwise provided in 35 Ill. Adm. Code

218.204(a), (c), (g), (h), (j), (l), (n), (p), and (q), compliance with the emission limitations is required on and after March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating 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 218.211(c) except where noted. (Note: The equation presented in 35 Ill. Adm. Code 218.206 shall be used to calculate emission limitations for determining compliance by add on controls, credits for transfer efficiency, emissions trades and cross line averaging.) The emission limitations are as follows:

On and after May 1, 2011:	kg VOM/kg (lb VOM/lb) solids applied	kg VOM/kg (lb VOM/lb) coatings applied
i. Pressure sensitive tape and label surface coatings	0.20	(0.067)
ii. All other paper coatings	0.40	(0.08)

- 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 (Use of Organic Material) shall apply only to photochemically reactive material.
- 3a. This permit is issued based upon the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK because this source does not perform publication, product and packaging rotogravure printing.
- b. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ because this source does not include web coating lines engaged in the coating of metal webs that are used in flexible packaging, and web coating lines engaged in the coating of fabric substrates for use in pressure sensitive tape and abrasive materials.
- 4a. Pursuant to 35 Ill. Adm. Code 218.187(a)(2)(A), notwithstanding 35 Ill. Adm. Code 218.187(a)(1): The following cleaning operations shall be

exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (e), (f), and (g).

- i. Janitorial cleaning;
  - ii. Stripping of cured coatings, inks, or adhesives;
  - iii. Cleaning operations in printing pre-press areas, including the cleaning of film processors, color scanners, plate processors, film cleaning, and plate cleaning.
- b. Pursuant to 35 Ill. Adm. Code 218.187(a)(2)(B), cleaning operations for emission units within the paper, film, and foil coating shall be exempt from the requirements of subsections (b), (c), (d), (e), (f), and (g) of 35 Ill. Adm. Code 218.187.
- c. Pursuant to 35 Ill. Adm. Code 218.204(c)(3), the paper coating limitation set forth in 35 Ill. Adm. Code 218.204(c) shall not apply to any owner or operator of any paper coating line on which flexographic, rotogravure, lithographic, or letterpress printing is performed if the paper coating line complies with the applicable emissions limitations in 35 Ill. Adm. Code 218 Subpart H. In addition, screen printing on paper is not regulated as paper coating, but is regulated under 35 Ill. Adm. Code 218 Subpart TT. On and after May 1, 2011, the paper coating limitation shall also not apply to coating performed on or in-line with any digital printing press, or to size presses and on-machine coaters on papermaking machines applying sizing or water-based clays.
- d. This permit is issued based on the rotogravure printing line not being subject to the control requirements of 35 Ill. Adm. Code 218.401 (Flexographic and Rotogravure Printing) as a result of the federally enforceable production and operating limitations of this permit, which restrict the maximum theoretical emissions of VOM from this facility to less than 100 tons per year and the potential to emit for VOM emissions to less than 25 tons per year. Pursuant to 35 Ill. Adm. Code 218.402(a), except as otherwise provided in 35 Ill. Adm. Code 218.401 the limitations of 35 Ill. Adm. Code 218.401 apply to all flexographic and rotogravure printing lines at a subject source. Sources with flexographic and/or rotogravure printing lines are subject sources if:
- i. Total maximum theoretical emissions of VOM from all flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines) at the source ever exceed 90.7 Mg (100 tons) per calendar year and the flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines) at the source are not limited to less than 90.7 Mg (100 tons) of VOM emissions per calendar year in the absence of air pollution control equipment through production or capacity limitations contained in a federally enforceable permit or a SIP revision; or

- ii. The flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines) at the source have a potential to emit 22.7 Mg (25 tons) or more of VOM per year.
- e. This permit is issued based on the Ink Mixing Operations not being subject to the requirements of 35 Ill. Adm. Code 218 Subpart AA (Paint and Ink Manufacturing). Pursuant to 35 Ill. Adm. Code 218.620(b), 35 Ill. Adm. Code 218 Subpart AA shall also apply to all paint and ink manufacturing sources which:
  - i. Have the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate, from process emission units that:
    - A. Are not regulated by 35 Ill. Adm. Code 218 Subparts B, E, F, H, Q, R, S, T (excluding 35 Ill. Adm. Code 218.486), V, X, Y, Z, or BB, or
    - B. Are not included in any of the following categories: synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, wood furniture, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations, or
  - ii. Produce more than 1,892,705 l (500,000 gal) per calendar year of paint or ink formulations which contain less than 10% (by weight) water, and ink formulations not containing as the primary solvents water, Magie oil or glycol.
- f. This permit is issued based upon the Ink-Jet Printers not being subject to the control requirements of 35 Ill. Adm. Code 218 Subpart TT (Other Emission Units). This is a result of the federally enforceable production and operating limitations of this permit, which restrict the maximum theoretical emissions of VOM from this facility to less than 100 tons per year and the potential to emit for VOM emissions to less than 25 tons per year.
- 5a. Pursuant to 35 Ill. Adm. Code 218.187(c), the owner or operator of a subject source shall demonstrate compliance with 35 Ill. Adm. Code 218.187 by using the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.187(g) and by complying with the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.187(e).
- b. Pursuant to 35 Ill. Adm. Code 218.187(d), the owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 218.187 shall comply with the following for each subject cleaning operation. Such requirements are in addition to work practices set forth in 35 Ill. Adm. Code 218.187(b)(4) and (b)(5), as applicable:

- i. Cover open containers and properly cover and store applicators used to apply cleaning solvents;
  - ii. Minimize air circulation around the cleaning operation;
  - iii. Dispose of all used cleaning solutions, cleaning towels, and applicators used to apply cleaning solvents in closed containers;
  - iv. Utilize equipment practices that minimize emissions.
- c. Pursuant to 35 Ill. Adm. Code 218.218(a), on and after May 1, 2011, every owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 218.204(c) shall:
- i. Store all VOM-containing cleaning materials in closed containers;
  - ii. Ensure that mixing and storage containers used for VOM-containing materials are kept closed at all times except when depositing or removing those materials;
  - iii. Minimize spills of VOM-containing cleaning materials;
  - iv. Convey VOM-containing cleaning materials from one location to another in closed containers or pipes; and
  - v. Minimize VOM emissions from the cleaning of storage, mixing, and conveying equipment.
- d. Pursuant to 35 Ill. Adm. Code 218.402(e), any owner or operator of any flexographic or rotogravure printing line that is exempt from any of the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402 is subject to the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.404(b) and (f), as applicable.
- 6a. In the event that the operation of this source 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.
- b. The fuel combustion units at this source shall only be operated with natural gas as the fuel. The use of any other fuel in the fuel combustion units at this source requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- c. The ink mixing operations shall not be operated with a material containing benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight, as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material. The use of any a material containing benzene, methylene

chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight, as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material in the water based in production plant requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.

- 7a. Emissions of volatile organic material (VOM) and operation of the following equipment shall not exceed the following limits:

<u>Equipment</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Rotogravure Press with Oven, Ink-Jet Printers and Ink Mixing	3.1	24.4	3.1	24.4

These limits are based on maximum material usage, individual material VOM/HAP content and standard emission factor for the ink mixing (Section 6.4, AP-42, Fifth Edition, Volume I, May 1983 (reformatted January 1995)). Total VOM/HAP emission E shall be calculated using the following equation:

$$E = E_{P\&C} + E_{IM}$$

where:

$E_{P\&C}$  - VOM/HAP emissions from Printing and Coating operations (tons)

$E_{P\&C}$  shall be calculated using the following equation:

$$E_{P\&C} = \frac{\sum A_i B_i}{2000}$$

where:

n = Number of different VOM and/or HAP containing inks and coatings used;

i = Subscript denoting an individual VOM and/or HAP containing material;

$A_i$  = Weight of VOM or single HAP per volume of each solvent used in units of lbs VOM or HAP/gallon or weight percent of VOM/HAP or single HAP of each VOM containing material used;

$B_i$  = Amount of each VOM and/or HAP containing material used each month in units of gallons or lbs.

$E_{IM}$  - VOM/HAP emissions from Ink Mixing operations (tons)

$E_{IM}$  shall be calculated using the following equation:

$$E_{IM} = \frac{\sum I_j C_j}{2000} \times 0.02$$

where

n = Number of different mixed inks;

j = Subscript denoting an individual ink;

I<sub>j</sub> = Weight of VOM or single HAP per volume of each mixed ink in units of lbs VOM or HAP/gallon or weight percent of VOM/HAP or single HAP;

C<sub>j</sub> = Amount of each mixed ink in units of gallons or lbs.

- b. Emissions and operation of all fuel combustion emission units shall not exceed the following limits:

Natural Gas Usage		Pollutant	Emission	Emissions	
(mmscf/Mo)	(mmscf/Yr)		Factor	(Tons/Mo)	(Tons/Yr)
20	180	CO	84	0.84	7.56
		NO <sub>x</sub>	100	1.00	9.00
		PM	7.6	0.08	0.68
		SO <sub>2</sub>	0.6	0.01	0.05
		VOM	5.5	0.06	0.50

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

- c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not 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. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements to obtain a CAAPP permit from the Illinois EPA.
- d. Compliance with the annual limits of this permit shall be determined on a daily basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 8a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:



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.

- 11a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(B), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall on and after January 1, 2012, collect and record the following information each month for each cleaning operation, other than cleaning operations identified in 35 Ill. Adm. Code 218.187 (a)(2):
  - i. The name and identification of each VOM-containing cleaning solution as applied in each cleaning operation;
  - ii. The VOM content of each cleaning solution as applied in each cleaning operation;
  - iii. The weight of VOM per volume and the volume of each as-used cleaning solution; and
  - iv. The total monthly VOM emissions from cleaning operations at the source;
- b. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by this 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.
- c. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:

- i. The name and identification number of each coating as applied on each coating line;
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
  - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(c)(2), the weight of VOM per weight of solids (or the weight of VOM per weight of coatings, as applicable) in each coating as applied each day on each coating line, and certified product data sheets for each coating.
- d. Pursuant to 35 Ill. Adm. Code 218.211(g)(3), on and after a date consistent with 35 Ill. Adm. Code 218.106(e), or on and after the initial startup date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 218.218 shall comply with the following: Maintain at the source all records required by 35 Ill. Adm. Code 218.211(g) for a minimum of three years from the date the document was created and make those records available to the Illinois EPA upon request.
- e. Pursuant to 35 Ill. Adm. Code 218.404(b)(2), any owner or operator of a rotogravure printing line exempted from any of the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402(a) on and after a date consistent with 35 Ill. Adm. Code 218.106, or, for flexographic or rotogravure printing lines that print flexible packaging or that print flexible packaging and non-flexible packaging on the same line, on and after January 1, 2012, the owner or operator of a flexographic and rotogravure printing line referenced in 35 Ill. Adm. Code 218.404(b) shall collect and record all of the following information each year 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 amount of each coating and ink as applied each year on each printing line.
- 12a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Identification and amount of each ink, primer, clean up solvent, thinner, and any other material used containing VOM and/or HAP (gallons or tons/month and gal or tons/year);
  - ii. VOM content of each ink, primer, clean up solvent, thinner, and any other material used containing VOM and/or HAP (lbs VOM/gallon or weight %);

- iii. Individual HAP content of each ink, primer, clean up solvent, thinner, and any other material used containing VOM and/or HAP (lbs VOM/gallon or weight %);
  - iv. Total natural gas usage (mmscf/month and mmscf/year);
  - v. Detailed calculations of VOM and individual HAP usages using the following equation in Condition 7(a); and
  - vi. Monthly and annual emissions of CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAPs from the source with supporting calculations (tons/month and tons/year).
- b. 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 storage device) 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.
- 13a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(C), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall comply with the following: Notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2), ever equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment, within 30 days after the event occurs.
- b. Pursuant to 35 Ill. Adm. Code 218.211(c)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
- i. Any record showing violation of 35 Ill. Adm. Code 218.204 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 from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1), as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with

all requirements of 35 Ill. Adm. Code 218.211(d), (e), or (i), as applicable.

- c. Pursuant to 35 Ill. Adm. Code 218.211(g)(2), on and after a date consistent with 35 Ill. Adm. Code 218.106(e), or on and after the initial startup date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 218.218 shall comply with the following: Notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.218 by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation.
  - d. Pursuant to 35 Ill. Adm. Code 218.404(b)(3), any owner or operator of a printing line which is exempted from any of the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402(a) on and after a date consistent with 35 Ill. Adm. Code 218.106, or, for flexographic or rotogravure printing lines that print flexible packaging or that print flexible packaging and non-flexible packaging on the same line, on and after January 1, 2012, the owner or operator of a flexographic and rotogravure printing line exempted from the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402(a) shall notify the Illinois EPA of any record showing that total maximum theoretical emissions of VOM from all printing lines exceed 90.7 Mg (100 tons) in any calendar year before the application of capture systems and control devices, or that the combined potential to emit of all flexographic and rotogravure printing lines at the source equals or exceeds 22.7 Mg (25 tons) of VOM in any calendar year, by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs.
  - e. Pursuant to 35 Ill. Adm. Code 218.637(a), upon request by the Illinois EPA, the owner or operator of an emission source which claims to be exempt from the requirements of 35 Ill. Adm. Code 218 Subpart AA shall submit records to the Illinois EPA within 30 calendar days from the date of the request which document that the emission source is in fact exempt from 35 Ill. Adm. Code 218 Subpart AA. These records shall include (but are not limited to) the percent water (by weight) in the paint or ink being produced and the quantity of Magie oil, glycol and other solvents in the ink being produced.
  - f. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
- 14a. If there is an exceedance of or a deviation from 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 or deviation. The report shall include the emissions released in

accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

- b. 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

If you have any questions on this, please call Valeriy Brodsky at 217/785-1705.

Raymond E. Pilapil  
Acting Manager, Permit Section  
Division of Air Pollution Control

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

REP:VJB:psj

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions 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 below the levels (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such 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>Equipment/Process</u>	E M I S S I O N S					(Tons/Year)	
	<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>
Retrogravure Press with Oven, Ink-Jet Printers, Ink Mixing, Natural Gas-Fired Combustion Units					24.40		
	<u>7.56</u>	<u>9.00</u>	<u>0.68</u>	<u>0.05</u>	<u>0.50</u>	<u>----</u>	<u>----</u>
Totals	<u>7.56</u>	<u>9.00</u>	<u>0.68</u>	<u>0.05</u>	<u>24.90</u>	<u>9.0</u>	<u>22.5</u>

VJB:psj