217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Videojet Technologies, Inc.
Attn: Robert Harcar
1500 Mittel Boulevard
Wood Dale, Illinois 60191-1073

Application No.: 91070095 I.D. No.: 043800AAL
Applicant's Designation: PRINTPRO1 Date Received: March 12, 2010
Subject: Non-Contact Inkjet Unit Assembly and Testing
Date Issued: August 6, 2010 Expiration Date: August 27, 2012
Location: 1500 Mittel Boulevard, Wood Dale, DuPage County, 60191-1073

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of 322 printing unit test stations and hoods, 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., volatile organic material (VOM) to less than 100 tons per year, and hazardous air pollutants (HAPs) to less than 10 tons per year of any single HAP or 25 tons per year of any combination of such 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.

ii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement 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. This permit is 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 result 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.

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. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.

All normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.

b. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:

i. The name and address of the source;

ii. The name and address of the owner or operator responsible for execution of the operating program;

iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;

iv. Location of unloading and transporting operations with pollution control equipment;

v. A detailed description of the best management practices utilized to achieve compliance with this Subpart, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;

vi. Estimated frequency of application of dust suppressants by location of materials; and

vii. Such other information as may be necessary to facilitate the Illinois EPA’s review of the operating program.

3a. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kgs/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 shall apply only to photochemically reactive material.

b. 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.

4a. Total combined operations and emissions of the 322 inkjet printing unit test stations shall not exceed the following limits:

i. VOM Emissions from usage of Ink and Solutions:

VOM in Ink and Solutions Usage		VOM Emissions	
(Tons/Month)	(Tons/Year)	(Tons/Month)	(Tons/Year)
1.72	17.2	1.72	17.2

These limits are based on maximum VOM usage and a material balance. Usage of VOM in ink and makeup solutions usage limits shall be determined using the following equation:

$$\text{VOM Usage} = \sum (\text{material usage}_i) \times (\text{weight \% VOM of material}_i)$$

ii. VOM Emissions from usage of Cleaning Solutions:

Adjusted* VOM in Cleaning Solutions Usage		VOM Emissions	
(Tons/Month)	(Tons/Year)	(Tons/Month)	(Tons/Year)
0.53	5.3	0.53	5.3

* Adjusted VOM in cleaning solutions usage = actual VOM in cleaning solutions usage - VOM from cleaning solutions which is collected in drums and shipped offsite.

These limits are based on a material balance and take into account the VOM used in the cleaning solutions which is collected in drums and shipped offsite and therefore not emitted at this plant.

b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act 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 per 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 requirement to obtain a Clean Air Act Permit Program (CAAPP) permit from the Illinois EPA.

c. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 months total).

5a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) 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.

b. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:

i. A list giving the name and identification number of each ink, makeup solution, cleaning solution, and any other material used containing VOM.

ii. A list of HAPs present and the weight percent content of each HAP for each ink, makeup solution, cleaning solution, and any other material used containing VOM.

iii. The weight percent VOM content of each ink, makeup solution, cleaning solution, and any other material used containing VOM.

iv. Actual usage rate of each ink, makeup solution, cleaning solution, and any other material used containing VOM (tons/month and tons/year).

v. Usage rate of VOM in inks, VOM in makeup solutions, VOM used in cleaning solutions, and adjusted VOM in cleaning solutions (tons/month and tons/year).

vi. VOM used in cleaning solutions which is collected and shipped offsite (tons/month and tons/year).

vii. Usage and emissions of single HAPs (tons/month and tons/year).

viii. Monthly and annual VOM and HAP emissions from use of ink, makeup solutions, cleaning solutions, and the total combined VOM and HAP emissions at this 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.

6. 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.

7. 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.

8. 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

<u>and</u> 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

It should be noted that this permit has been revised to incorporate Construction Permit 10030037, which adds additional inkjet printing unit test stations and decrease VOM emissions.

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

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:DWH:jws

cc: Illinois EPA, FOS Region 1
USEPA - Lotus Notes

Attachment A- Emissions Summary

This attachment provides a summary of the maximum emissions of the ink jet printing equipment manufacturer 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 source. The resulting maximum emissions are below the levels (e.g., 100 tons/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 should be less than predicted in this summary to the extent that materials are not used at the maximum levels on which this permit is based.

	E M I S S I O N S (Tons/Year)		
Emission Units	VOM	Single HAP	Total HAPs
322 Printing Unit Test Stations	17.20		
Ink Cleaning Solvents	5.30		
Totals	22.50	9.0	22.5

DWH:jws