

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Videojet Technologies, Inc. for a construction Permit and  
Federally Enforceable State Operating Permit (FESOP) Revision for  
1500 Mittel Boulevard  
Wood Dale, Illinois 60191

Site Identification No.: 043800AAL  
Application No.: FESOP: 91070095  
Construction: 10030037

Illinois EPA Contacts  
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## **INTRODUCTION**

Videojet Technologies, Inc. has applied for a construction permit and a revision of its Federally Enforceable State Operating Permit (FESOP) for its non-contact inkjet unit assembly and testing plant at 1500 Mittel Boulevard in Wood Dale. 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 construction permit and a draft of the revised FESOP permit that it would propose to issue for the plant. However, before issuing these permits, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permits that it would propose to issue.

## **II. SOURCE DESCRIPTION**

The construction permit is for 150 printing unit test stations. The facility will be assembling a type of new inkjet printing unit. These inkjet printing units will be assembled at the facility and tested using inks, makeup solutions and cleanup solvents to ensure proper operation prior to shipment to customers. In addition, inkjet printing units that are sent to the facility for refurbishing or repair are also to be tested. The facility is already permitted to operate printing unit test stations and the construction permit requests to increase the number of test stations. The FESOP revision will incorporate the new test stations into the existing FESOP. Organic solvents are used in the inks, makeup solutions and in the clean-up operations. The principal air contaminant emitted from the facility is Volatile Organic Material (VOM), generated during the ink application and from solvents usage.

## **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 been operating this plant under 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 applicable rule for inkjet printers emitting less than 25 tons of VOM emissions per year is found in 35 Ill. Adm. Code 218.301. This rule requires each emission unit must emit less than eight pounds per hour of organic material. The application shows that the plant is in compliance with applicable state and federal emission standards.

**V. CONTENTS OF THE PERMIT**

The permits that the Illinois EPA is proposing to issue would continue to 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 continue to 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 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 their permits. The Illinois EPA is therefore proposing to issue the permits.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permits. 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.