



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

OCT 30 2015

Mr. Ray Pilapil
Permit Section Manager
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Mr. Pilapil:

The U.S. Environmental Protection Agency has reviewed the draft Federally Enforceable State Operating Permit (FESOP) (Facility I.D. No. 031012AGV, Permit No. 05060030) for Atlantic Press, Inc., located at 6721 West 73rd Street, Bedford Park, Cook County, Illinois. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

- 1.) The Project Summary and draft permit do not include sufficient information to support the determination that the source will not exceed the major source thresholds of the Clean Air Act Permit Program¹. The emission summary provided in Attachment A of the draft permit provides a summary of emissions from the lithographic printing plant operation. However, the emissions were calculated using an annual operating scenario from such a plant and suggests that the emissions are not based on the source's maximum potential to emit (PTE). It is not clear whether emissions may exceed the Title V major source threshold based on the source operating at unlimited PTE. The permit record should reflect emission information that is based on maximum PTE. If emissions of pollutants from the source exceed major source thresholds, the permit must establish limits, as appropriate, to restrict PTE such that this FESOP is correctly issued.

Conversely, Condition (11)(a) does establish some sort of emission limitation for volatile organic material (VOM) emissions from the source. However, the purpose of this condition (i.e.; Title V applicability avoidance or construction permit limit) is not clear. Please provide a clarification of the purpose of this limit.

¹ 35 Illinois Administrative Code §252.102(3). Applicability.

35 Illinois Administrative Code §252.203(a),(b). Fact Sheet and Statement of Basis.

- 2.) The Project Summary or the permit should contain a complete description (including dates of construction, capacity of unit, etc.) of the emission units and air pollution control equipment at the facility. Further, the Project Summary should provide a summary of all emissions of pollutants from every emission unit at the source.
- 3.) Condition (4)(b)(i)(C) specifies the minimum VOM reduction efficiencies required by the press dryer exhaust afterburners, based on their construction date, as required by 35 Illinois Administrative Code (IAC) 218.407(a)(1)(C)(ii). However, instead of including the specific requirements that apply to the configuration of the plant, the permit contains decision trees of applicable requirements. The permit/permit record lacks detailed information (see Comments #1 and #2), and as a result, it is impossible to determine which requirements apply. Furthermore, since this information is not available in the permit/permit record, this condition is not practically enforceable. Please revise the draft permit/permit record to include complete descriptions of the afterburners associated with the source and their construction date(s) as well as only the relevant portion of requirements that apply to the configuration at the source.
- 4.) Condition (11)(b) provides an equation to calculate VOM emissions from the four heatset web offset lithographic printing presses. However, it is unclear as to how this equation is appropriate in calculating VOM emissions from these emission units. The permit/permit record should include supporting documentation that demonstrates how the Illinois Environmental Protection Agency came to the conclusion that this is the appropriate equation¹.
- 5.) The descriptions of the variables listed below, presented in the equation of Condition (11)(b), should be clarified to avoid ambiguity in the permit requirements:
 - FS_j = Fountain solution containing no alcohol usage (tons)
 - CS_K = Automatic cleaning solution with vapor pressure less than 10 mm of Hg usage (tons)
 - CS_1 = Manual cleaning solution with vapor pressure less than 10 mm of Hg usage (tons)
 - S_n = Other solvents usage (tons)
 - a. It is unclear how the permittee will calculate VOM emissions from fountain solutions that contain alcohol or whether the intent is to prohibit the use of such fountain solutions. Please provide clarification.
 - b. It is unclear how the permittee will calculate VOM emissions from automatic cleaning solutions with vapor pressures greater than or equal to 10 mm of Hg or whether the intent is to prohibit the use of such automatic cleaning solutions. Please provide clarification.
 - c. It is unclear whether the variable S_n consists solely of manual cleaning solvents with vapor pressure greater than or equal to 10 mm of Hg. Please provide clarification.
- 6.) The equation presented in Condition (11)(b) does not specify the reference temperature at which the vapor pressure of 10 mm of Hg must be evaluated for CS_K , V_{CSK} , CS_1 and V_{CS1} . Please include this information in the permit.

- 7.) The emissions table in Attachment A provides the maximum Hazardous Air Pollutants (HAPs) emissions from the source operating in compliance with the requirements of the FESOP as 7.9 tons/year of any single HAP and 19.9 tons/year of any combination of such HAPs. Condition (11)(d) states that the emissions of HAPs as listed in Section 112(b) of the Clean Air Act from this source shall not exceed those limits.

The supporting documentation, however, does not specify how the maximum HAP emissions from the source were calculated nor how the permittee should determine HAP emissions to demonstrate compliance with the HAP emission limits. Please provide such calculations and specify how the permittee should determine HAP emissions, in order to provide a sufficient statement of basis¹ and to make this limitation enforceable as a practical matter.

- 8.) The Project Summary contains conflicting information concerning the status of the permit (whether it is a new FESOP or a renewal of an existing permit). Please clarify and revise accordingly.
- 9.) There is a typographical omission (in bold as follows) in the introductory paragraph on page 1 of the permit:

“... and one (1) heatset web offset lithographic printing press (#2) controlled by an individual **regenerative thermal oxidizer** (RTO #2) pursuant...”

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Rachel Rineheart, of my staff, at (312) 886-7017.

Sincerely,



for Genevieve Damico
Chief
Air Permits Section