



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

SEP 17 2012

REPLY TO THE ATTENTION OF:

Ed Bakowski
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Mr. Bakowski:

The U.S. Environmental Protection Agency has the following comments on the Illinois Environmental Protection Agency's draft of the Clean Air Act Permit for Three Z Printing Company (permit number 95120108). The existing source is major under the Title V program.

Our staff has been involved in discussions with your staff on our review of the permit. We understand, through these discussions with the permit writer, that condition 4.1 pertains to the printing lines (emissions of Volatile Organic Material (VOM) are as a result of the printing operations and/or drying of the ink). Condition 4.2 pertains to the natural gas dryer with respect to emissions resulting solely from the combustion of natural gas.

- 1) The permit is not clear on how the facility will demonstrate compliance with some applicable requirements. The requirements within the sections for the "Compliance Method" do not appear to include a monitoring scheme that links compliance with the actual limits for each respective pollutant. To address, additional discussion of a correlation developed in the Statement of Basis may resolve this, or else revision of the monitoring may be necessary. Please address this comment for the following:
 - a. Particulate Matter (PM) limitations for the printing lines and dryers in conditions 4.1.2.b. and 4.2.2.b., respectively. It is not clear how the source will comply with the 0.55 lb/hr PM limits.
 - b. Condition 4.1.2.c.i.A., 8 lb/hr of VOM emissions. The permit contains recordkeeping requirements under condition 4.1.2.c.ii.B which would include appropriate data gathering to determine emissions on a monthly and yearly basis. However, it is not clear how this recordkeeping, will also serve to demonstrate compliance with the hourly limit.
 - c. Nitrogen Oxide (NO_x) Title 1 limits in condition 4.2.2.c. The corresponding monitoring requirements references conditions 4.2.2.(g) and (h)¹ that includes operational and production requirements as well as work practice requirements,

¹ The permit actually references 4.1.2.(h) on page 23 in conditions 4.2.2.b and 4.2.2.c., however, through discussions with the permit writer, it is understood that the conditions intended to reference condition 4.2.2.(h). This is also highlighted in comment 2).

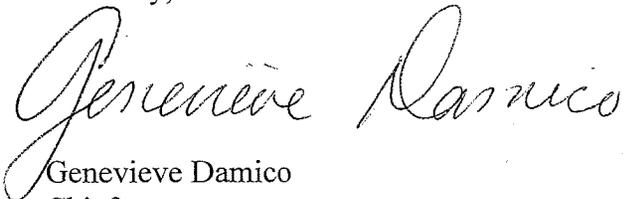
however, it is not clear how these conditions result in a monitoring scheme that will result in adequate demonstration of compliance with the 1.5 tons/month and 17.6 tons/year limits.

- d. Carbon Monoxide (CO) Title 1 limits in condition 4.2.2.d. Similar to the discussion above for NO_x, the corresponding monitoring requirements reference conditions 4.2.2.(g) and (h), but it is not clear how the monitoring scheme will result in adequate demonstration of compliance with the 1.3 tons/month and 14.8 tons/year limits.
 - e. VOM hourly and Title 1 limits in condition 4.2.2.f. Similar to the comments above for NO_x and CO, the corresponding monitoring requirements reference conditions 4.2.2.(g) and (h), but it is not clear how the monitoring scheme will result in adequate demonstration of compliance with the 8 lb/hr, the 1.3 tons/month and 14.8 tons/year limits.
- 2) Conditions 4.2.2.b and 4.2.2.c. reference condition 4.1.2.(h) within the discussions on the "Compliance Method" for NO_x and CO. However, it appears that the more appropriate citation is 4.2.2.(h).
- 3) Section 3 of the permit identifies facility wide Title 1 limits of 248.9 tons/year and a 25 tons/month. The 248.9 tons/year limit also serves a purpose of restricting emissions from the facility to levels that would consider them to be minor for purposes of the Prevention of Significant Deterioration permit program. As per our discussion, please revise Section 4 of the permit to include the 248.9 tons/year limit as a synthetic minor limit.

We provide these comments to help ensure that the project meets all federal requirements, that the permit provides all necessary information so that it is readily accessible to the public, and that the record provides adequate support for the permit decision.

We look forward to working with you to address all of our comments. If you have any further questions, please feel free to contact Danny Marcus, of my staff, at (312) 353-8781.

Sincerely,



Genevieve Damico
Chief
Air Permits Section