IEPA ATTACHMENT NO. 11

ILLINOIS POLLUTION CONTROL BOARD
January 18, 2001

IN THE MATTER OF:	)	
	)	
PETITION OF BEMA FILM SYSTEMS, INC.	)	
FOR AN ADJUSTED STANDARD FROM 35	)	AS 00-11
ILL. ADM. CODE SECTIONS 218.401(a), (b),	)	(Adjusted Standard – Air)
and (c)	)	

SUSAN W. HORN OF JOHNSON & BELL, LTD. APPEARED ON BEHALF OF THE PETITIONER; and

BONNIE SAWYER APPEARED ON BEHALF OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY.

OPINION AND ORDER OF THE BOARD (by E.Z. Kezelis):

ORDER

The Board hereby adopts the following adjusted standard, pursuant to the authority of Section 28.1 of the Environmental Protection Act (415 ILCS 5/28.1 (1998)).

1. This adjusted standard applies only to BEMA Film Systems, Inc.'s (BEMA) two existing central impression presses and only to the extent that the presses are being used for printing on plastic, such as polypropylene, polyester, cellophane and polyethylene ("high-slip"), and does not apply to any printing operations on other substrates.

2. BEMA may apply any coating or ink with volatile organic material (VOM) content less than or equal to eighty-two (82%) percent by weight of the coating and ink (minus water and any compounds that are specifically exempted from the definition of VOM) on a monthly-weighted average basis. Compliance with this limitation must be demonstrated through the applicable coating and ink analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping requirements specified in condition (4) below.

3. For purposes of establishing an Emissions Reduction Marketing System (ERMS) baseline for BEMA, its actual emissions from the appropriate baseline seasonal allotment period will be adjusted downward to reflect usage of coatings and inks containing no more than seventy-two percent (72%) VOM by weight of the coatings and inks (minus water and any compounds that are specifically exempted from the definition of VOM) applied.

4. BEMA shall collect and record the following information each day for the printing presses subject to this adjusted standard and maintain such information at BEMA's Elmhurst printing facility for a period of five years:

   A) The name and identification number of each coating and ink applied;

B) The VOM content and the weight of each coating and ink applied;

C) The monthly-weighted average VOM content of all coating and inks applied.

Any record showing violation of this adjusted standard shall be reported by sending a copy of such record to the Agency within 30 days following the occurrence of this violation.

5. BEMA must perform (alone or in conjunction with others) three experiments each year, including any experiments requested by the Agency, of alternative inks to determine if these inks are compliant with the Flexographic Printing Rule and technically feasible for BEMA's printing operations. In addition BEMA will experiment with substrates as suggested by the Agency. Forty-five days following each experiment conducted pursuant to this provision, BEMA shall report its findings and supporting documentation to the Agency;

6. BEMA shall continue to investigate alternative control technologies, including any technologies suggested by the Agency. BEMA shall report the results of those investigations to the Agency within forty-five days; ink applied;

7. Each year, in conjunction with submittal of its annual Clean Air Act Permitting Program (CAAPP) compliance certification or its annual emissions report, if a CAAPP compliance certification is not required, BEMA shall submit a report to the Agency describing the investigations of compliant inks and coatings, different substrates, and add-on control technologies it has undertaken in the previous calendar year and the results of these investigations;

8. BEMA shall not operate any other printing press at its Elmhurst, Illinois, facility without full compliance with the requirements of the Flexographic Printing Rule (35 Ill. Adm. Code 218.401(a), (b), (c));

9. This adjusted standard must be revised or withdrawn if BEMA no longer prints the majority of its images on "high-slip" substrates, or on the outside surface of the "high-slip" substrate;

10. This adjusted standard must be revised or withdrawn if BEMA determines that any add-on control system is economically reasonable and technically feasible or if BEMA uses any add-on control system that controls VOM emissions;

11. This adjusted standard must be revised if it becomes feasible for BEMA to use compliant inks and coatings for the majority of its printing operations;

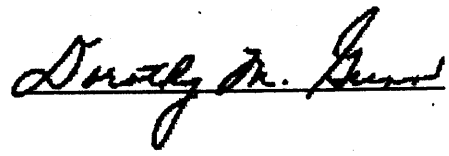
12. This adjusted standard must be withdrawn if it becomes feasible for BEMA to use compliant inks and coatings for all of its printing operations; and

13. If this adjusted standard is revised or withdrawn and BEMA is a participating source in the ERMS program, BEMA's ERMS baseline will be adjusted downward to the extent that the new or revised requirements for the two central impression presses subject to this adjusted standard would result in lower baseline emissions. If such an adjustment to BEMA's ERMS baseline is required by this provision, the seasonal allotment period used in its original baseline determination shall be used to determine its adjusted baseline. BEMA must submit a CAAPP application for revised baseline, as required by this provision, within 60 days of final withdrawal of, or revision to this adjusted standard.

IT IS SO ORDERED.

Section 41 of the Environmental Protection Act (415 ILCS 5/41 (1998)) provides for the appeal of final Board orders to the Illinois Appellate Court within 35 days of the date of service of this order. Illinois Supreme Court Rule 335 establishes such filing requirements. See 172 Ill. 2d R. 335; see also 35 Ill. Adm. Code 101.520, Motions for Reconsideration.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above opinion and order was adopted on the 18th day of January 2001 by a vote of 7-0.



Dorothy M. Gunn, Clerk
Illinois Pollution Control Board

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

RENEE CIPRIANO, DIRECTOR

(217) 524-7636

November 14, 2001

Mr. Jay Bortzer
Air and Radiation Division
Region V
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

Dear Mr. Bortzer:

The effective date for air pollution control adjusted standards granted by the Illinois Pollution Control Board is the date the Board adopts the final adjusted standard, unless the final Board order adopting the standard provides for another effective date. The orders granting adjusted standards for Formel Industries, Inc. (AS 00-13), BEMA Film Systems, Inc. (AS 00-11), and Vonco Products, Inc. (AS 00-12) were adopted by the Pollution Control Board on January 18, 2001. As these orders provided no alternate date for effectiveness, the adjusted standards were effective upon adoption.

Sincerely,

Dennis A. Lawler, Manager
Division of Air Pollution Control

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