

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB No. 20-
	)	(Enforcement - _____)
MASTER GRAPHICS, LLC,	)	
an Illinois limited liability company,	)	
	)	
Respondent.	)	

**NOTICE OF FILING**

To: Charles M. Gering  
Attorney at Law  
Pedersen & Houpt  
161 North Clark Street, Suite 2700  
Chicago, Illinois 60601  
cgering@pedersenhaupt.com

PLEASE TAKE NOTICE that on the 30<sup>th</sup> day of June, 2020, I filed with the Clerk of the Illinois Pollution Control Board a Complaint, Motion for Relief from Hearing Requirement and Notice of Electronic Service, and Stipulation and Proposal for Settlement, copies of which are attached hereto and are hereby served upon you.

PEOPLE OF THE STATE OF ILLINOIS  
KWAME RAOUL  
Attorney General of the State of Illinois

By: /s/ Daniel I. Rottenberg  
DANIEL I. ROTTENBERG  
Assistant Attorney General  
Environmental Bureau North  
69 W. Washington Street, Suite 1800  
Chicago, IL 60602  
(312) 814-3816  
Primary: [drottenberg@atg.state.il.us](mailto:drottenberg@atg.state.il.us)  
Secondary: [mcacaccio@atg.state.il.us](mailto:mcacaccio@atg.state.il.us)

**CERTIFICATE OF SERVICE**

I, DANIEL I. ROTTENBERG, an Assistant Attorney General, do certify that I caused to be mailed this 30<sup>th</sup> day of June, 2020, the foregoing Complaint, Motion for Relief from Hearing Requirement and Notice of Electronic Service, Stipulation and Proposal for Settlement and Notice of Filing with Respondent, Master Graphics, LLC, by electronic mail with receipt notification requested to the person listed on the Notice of Filing on June 30, 2020.

/s/ Daniel I. Rottenberg  
DANIEL I. ROTTENBERG  
Assistant Attorney General  
Environmental Bureau  
69 W. Washington Street, Suite 1800  
Chicago, IL 60602  
(312) 814-3816

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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MASTER GRAPHICS, LLC,	)	
an Illinois limited liability company,	)	
	)	
Respondent.	)	

**COMPLAINT**

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois (“Complainant”), complains of the Respondent, MASTER GRAPHICS, LLC, an Illinois limited liability company (“Respondent”), as follows:

**COUNT I**  
**CONSTRUCTING AN EMISSION SOURCE WITHOUT THE REQUISITE PERMIT**

1. This Complaint is brought on behalf of the PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, on his own motion and at the request of the Illinois Environmental Protection Agency (“Illinois EPA”), against Respondent, pursuant to Section 31 of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31 (2018).

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2018), and charged, *inter alia*, with the duty of enforcing the Act.

3. At all times relevant to the Complaint, Respondent has been and is an Illinois limited liability company duly authorized to transact business in the State of Illinois.

4. At all times relevant to the Complaint, Respondent has been and remains the operator of a lithographic printing facility located at 1100 South Main Street, Rochelle, Ogle County, Illinois (“Facility”).

5. At the Facility, Respondent operates at least five heatset web offset lithographic printing presses controlled by four thermal oxidizers.

6. Respondent’s operations at the Facility emit or are capable of emitting volatile organic material (“VOM”) into the environment.

7. On November 16, 2018, Illinois EPA issued Federally Enforceable State Operating Permit (“FESOP”) No. 07110044 to Respondent for operations at the Facility. FESOP No. 07110044 authorized, among other things, the operation of the five heatset web offset lithographic printing presses and four thermal oxidizers referred to in paragraph 5.

8. On February 26, 2019, Illinois EPA inspected the Facility (“February 2019 Inspection”).

9. During the February 2019 Inspection, Respondent informed Illinois EPA that it had replaced one of the five heatset web offset lithographic printing presses permitted by FESOP No. 07110044 with a new printing press (“New Press #1”) at the Facility.

10. New Press #1 began operating in July 2018, or on a date better known to Respondent.

11. Respondent installed New Press #1 without first obtaining a construction permit from Illinois EPA.

12. As of the date of filing this Complaint, Respondent continues to operate New Press #1 at the Facility.

13. New Press #1 emits or has the potential to emit VOM into the environment.

14. Section 9(b) of the Act, 415 ILCS 5/9(b) (2018), provides as follows:

No person shall:

\* \* \*

(b) Construct, install, or operate any equipment, facility, vehicle, vessel, or aircraft capable of causing or contributing to air pollution or designed to prevent air pollution, of any type designated by Board regulations, (1) without a permit granted by the Agency unless otherwise exempt by this Act or Board regulations or (2) in violation of any conditions imposed by such permit.

15. Section 3.315 of the Act, 415 ILCS 5/3.315 (2018), provides the following definition:

“Person” is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

16. Respondent, a limited liability company, is a “person” as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2018).

17. Section 3.165 of the Act, 415 ILCS 5/3.165 (2018), provides the following definition:

“Contaminant” is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

18. VOM is a “contaminant” as that term is defined by Section 3.165 of the Act, 415 ILCS 5/3.165 (2018).

19. Section 3.115 of the Act, 415 ILCS 5/3.115 (2018), provides the following definition:

“Air pollution” is the presence in the atmosphere of one or more contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant, or animal life, to health, or to property, or to unreasonably interfere with the enjoyment of life or property.

20. New Press #1 is capable of causing or contributing to “air pollution” as that term is defined by Section 3.115 of the Act, 415 ILCS 5/3.115 (2018), because it emits, or is capable of emitting, contaminants into the atmosphere.

21. Section 201.142 of the Illinois Pollution Control Board (“Board”) Air Pollution Regulations, 35 Ill. Adm. Code 201.142, provides as follows:

No person shall cause or allow the construction of any new emission source or any new air pollution control equipment, or cause or allow the modification of any existing emission source or air pollution control equipment, without first obtaining a construction permit from the Agency, except as provided in Section 201.146 or Section 201.170(b) of this Part.

22. Section 201.102 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.102, provides the following definitions:

“Air Contaminant”: Any solid, liquid or gaseous matter, any odor or any form of energy that is capable of being released into the atmosphere from an emission source.

“Construction”: Commencement of on-site fabrication, erection or installation of an emission source or of air pollution control equipment.

“Emission Source”: Any equipment or facility of a type capable of emitting specified air contaminants to the atmosphere.

“New Emission Source”: Any emission source, the construction or modification of which is commenced on or after April 14, 1972.

“Specified Air Contaminant”: Any air contaminant as to which this Subtitle contains emissions standards or other specific limitations and any contaminant regulated in Illinois pursuant to Section 9.1 of the Act.

23. The installation of New Press #1 at the Facility in July 2018 constitutes “construction” as that term is defined by Section 201.102 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.102.

24. VOM is matter capable of being released into the atmosphere from an emission source, and is therefore an “air contaminant” as that term is defined in Section 201.102 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.102.

25. Subtitle B (Air Pollution), of Title 35 (Environmental Protection) of the Illinois Code of Administrative Regulations contains specific limits on VOM, and therefore VOM is a “specified air contaminant” as that term is defined in Section 201.102 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.102.

26. New Press #1 is capable of emitting VOM, a “specified air contaminant,” into the atmosphere, and is therefore an “emission source” as that term is defined by Section 201.102 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.102.

27. New Press #1 was constructed at the Facility after April 14, 1972 and therefore constitutes a “new emission source” as that term is defined in Section 201.102 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.102.

28. By commencing construction of New Press #1 at the Facility without obtaining a construction permit issued by the Illinois EPA, Respondent violated Section 9(b) of the Act, 415 ILCS 5/9(b) (2018), and Section 201.142 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.142.

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against Respondent, MASTER GRAPHICS, LLC, an Illinois limited liability company, with respect to Count I:

1. Authorizing a hearing in this matter at which time Respondent will be required to answer the allegations herein.

2. Finding that Respondent has violated Section 9(b) of the Act, 415 ILCS 5/9(b) (2018), and Section 201.142 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.142;
3. Ordering the Respondent to cease and desist from any future violations of Section 9(b) of the Act, 415 ILCS 5/9(b) (2018), and Section 201.142 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.142;
4. Assessing against the Respondent a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act and pertinent regulations, and an additional civil penalty of Five Thousand Dollars (\$5,000.00) for each day of violation;
5. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees against Respondent; and
6. Granting other such relief as the Board deems appropriate and just.

**COUNT II**  
**OPERATING AN EMISSION SOURCE WITHOUT THE REQUISITE PERMIT**

- 1-27. Complainant realleges and incorporates by reference paragraphs 1 through 27 of Count I as paragraphs 1 through 27 of this Count II.
28. The operation of New Press #1 was not authorized by FESOP No. 07110044 issued to the Facility on November 15, 2018.
29. Section 201.143 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.143, provides as follows:

No person shall cause or allow the operation of any new emission source or new air pollution control equipment of a type for which a construction permit is required by Section 201.142 without first obtaining an operating permit from the Agency, except for such testing operations as may be authorized by the construction permit. Applications for operating permits shall be made at such times and contain such information (in addition to the information required by Section 201.157) as shall be specified in the construction permit.



30. Respondent was required to obtain a construction permit for New Press #1 pursuant to Section 201.142 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.142, and was therefore required to obtain an operating permit from Illinois EPA for New Press #1 pursuant to Section 201.143 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.143.

31. From at least July 2018 to the date of filing this Complaint, Respondent has operated New Press #1 without the requisite operating permit.

32. By operating New Press #1 without the requisite operating permit, Respondent violated Section 201.143 of the Board Air Pollution Regulations, 35 Ill. Adm. Code. 201.143, and thereby violated Section 9(b) of the Act, 415 ILCS 5/9(b) (2018).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against Respondent, MASTER GRAPHICS, LLC, an Illinois limited liability company, with respect to Count II:

1. Authorizing a hearing in this matter at which time Respondent will be required to answer the allegations herein;
2. Finding that the Respondent has violated Section 9(b) of the Act, 415 ILCS 5/9(b) (2018), and Section 201.143 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.143;
3. Ordering the Respondent to cease and desist from any future violations of Section 9(b) of the Act, 415 ILCS 5/9(b) (2018), and Section 201.143 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.143;
4. Assessing against the Respondent a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act and pertinent regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;

5. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees against Respondent; and

6. Granting other such relief as the Board deems appropriate and just.

**COUNT III**  
**FESOP PERMIT VIOLATIONS**

1-19. Complainant realleges and incorporates herein by reference paragraphs 1 through 10 and 12 through 20 of Count I, as paragraphs 1 through 19 of this Count III.

20. The five heatset web offset lithographic printing presses at the Facility are capable of causing or contributing to “air pollution” as that term is defined by Section 3.115 of the Act, 415 ILCS 5/3.115 (2018), because they emit, or are capable of emitting, contaminants into the atmosphere.

21. The four thermal oxidizers at the Facility were designed to prevent air pollution.

22. Condition 14(b) of FESOP No. 07110044 provides as follows:

Each thermal oxidizer shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the afterburner combustion temperature. During periods when the strip chart recorder or disk storage device is inoperable, the Permittee shall manually record the thermal oxidizer combustion temperature at least one time per operating day.

23. During the February 2019 Inspection, New Press #1 was in operation, however neither a strip chart recorder nor disk storage was operational on the thermal oxidizer controlling emissions from New Press #1. In addition, no operational data was available to demonstrate that Respondent was manually recording the combustion temperature at least one time per operating day.

24. For a period of time best known to Respondent, Respondent failed to equip the thermal oxidizer controlling emissions from New Press #1 with a functioning strip chart recorder

or disk storage, and failed to manually record the combustion temperature at least one time per operating day.

25. By failing to equip the thermal oxidizer controlling emissions from New Press #1 with a functioning strip chart recorder or disk storage, or manually record combustion temperature at least one time per operating day, Respondent violated Condition 14(b) of FESOP No. 07110044.

26. Condition 8(c) of FESOP No. 07110044 provides as follows:

Each catalytic afterburner's combustion chamber and each thermal oxidizer's combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. These temperatures shall be maintained during operation of each associated press.

27. Because the thermal oxidizer controlling emissions from New Press #1 was not equipped with a strip chart recorder or disk storage, and Respondent was not manually recording the combustion temperature, Illinois EPA inspectors could not determine whether the requisite temperature was being maintained during the February 2019 Inspection.

28. By failing to demonstrate that it was maintaining the thermal oxidizer combustion temperature required by Condition 8(c) of FESOP No. 07110044, Respondent violated Condition 8(c) of FESOP No. 07110044.

29. Condition 13(b) of FESOP No. 07110044 provides as follows:

Testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted . . .

30. For a period of time best known to Respondent, and continuing to the date of filing this Complaint, Respondent failed to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions.

31. By failing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions, Respondent violated Condition 13(b) of FESOP No. 07110044.

32. Condition 17(a)(iv) of FESOP No. 07110044 provides as follows:

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

iv. Names and amounts of lithographic inks, fountain solutions, other materials and clean-up solvents used (tons/month and tons/year);

33. During the February 2019 Inspection, Respondent could not produce records of the names and amounts of lithographic inks, fountain solutions, other materials and clean-up solvents used in tons/month and tons/year.

34. For a period of time best known to Respondent, Respondent failed to maintain records of the names and amounts of lithographic inks, fountain solutions, other materials and clean-up solvents used in tons/month and tons/year.

35. By failing to keep required records of the names and amounts of materials used in tons/month and tons/year, Respondent violated Condition 17(a)(iv) of FESOP No. 07110044.

36. Condition 9(c) of FESOP No. 07110044 provides as follows:

The emissions of VOM and HAP from the printing lines shall be calculated using the following equation:

$$E = \sum[I_i \times V_{Ii} \times 0.8 \times (1-CE)] + \sum[F_{Sj} \times V_{FSj} \times (1-0.7 \times CE)] + \sum[C_{Sk} \times V_{CSk} \times (1-0.4 \times CE)] + \sum[C_{Sl} \times V_{CSl} \times 0.5] + \sum(S_n \times V_{Sn})$$

Where:

E = VOM/HAP emissions (tons);

I<sub>i</sub> = Ink usage (tons);

V<sub>Ii</sub> = VOM/HAP content of the ink (weight fraction);

F<sub>Sj</sub> = Fountain solution containing no alcohol usage (tons);

V<sub>FSj</sub> = VOM/HAP content of fountain solution containing no alcohol (weight fraction);

- $C_{Sk}$  = Automatic cleaning solution with vapor pressure less than 10 mm of Hg usage (tons);
- $V_{CSk}$  = VOM/HAP content of automatic cleaning solution with vapor pressure less than 10 mm of Hg (weight fraction);
- $C_{SI}$  = Manual cleaning solution with vapor pressure less than 10 mm of Hg usage (tons);
- $V_{CSI}$  = VOM/HAP content of manual cleaning solution with vapor pressure less than 10 mm of Hg (weight fraction);
- $S_n$  = Other materials usage (tons);
- $V_{Sn}$  = VOM/HAP content of other materials (weight fraction).
- CE = Afterburner control efficiency (% reduction). CE with afterburner running equals the values for each material listed in Condition 7(a)(ii). CE = 0 with afterburner not operating.

37. During the February 2019 Inspection, Respondent could not produce records showing that it had calculated VOM and hazardous air pollutant (“HAP”) emissions from the printing lines as required by Condition 9(c) of FESOP No. 07110044.

38. For a period of time best known to Respondent, and continuing to the date of filing this Complaint, Respondent failed to calculate VOM and HAP emissions from the printing lines as required by Condition 9(c) of FESOP No. 07110044.

39. By failing to calculate VOM and HAP emissions from the printing lines as required by Condition 9(c) of FESOP No. 07110044, Respondent violated Condition 9(c) of FESOP No. 07110044.

40. Condition 20(a) of FESOP No. 07110044 provides as follows:

If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit or otherwise, the Permittee shall submit a report to the Illinois EPA’s Bureau of Air Compliance Section in Springfield, Illinois within thirty (30) days after the exceedance or deviation. The report shall identify the duration and the emissions impact of the exceedance or deviation, a copy of the relevant records and information to resolve the exceedance or deviation, and a description of the efforts to reduce emissions from, and the duration of exceedance or deviation, and to prevent future occurrences of any such exceedance or deviation.

41. To date, Respondent has failed to submit deviation reports to the Illinois EPA for deviations from the requirements of FESOP No. 07110044 as alleged in paragraphs 22 through 39 of this Count III.

42. By failing to submit deviation reports, Respondent violated Condition 20(a) of FESOP No. 07110044.

43. Condition 9(a)(i) of FESOP No. 07110044 provides as follows:

Total Material Usage and VOM Content:

<u>Material</u>	<u>VOM Content (% by Weight)</u>	<u>Material Usage</u>	
		<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Blanket Wash	75.0	2.8	28
Fountain Solution	8.0	5.5	55
Ink	40.0	63.8	638
Varnish	50.0	2.8	28
Glue	10.0	3.0	30

44. From January 1, 2019 to March 3, 2020, or for a period of time better known to Respondent, Respondent utilized an ink that contained 42.5% by weight VOM content.

45. By utilizing an ink that contained greater than 40.0% by weight VOM content, Respondent violated Condition 9(a)(i) of FESOP No. 07110044.

46. From January 1, 2019 to March 3, 2020, or for a period of time better known to Respondent, Respondent utilized a blanket wash with a VOM content of approximately 100.0% by weight.

47. By utilizing a blanket wash with a VOM content greater than 75.0% by weight, Respondent violated Condition 9(a)(i) of FESOP No. 07110044.

48. According to information provided to Illinois EPA by Respondent in a report dated March 18, 2020, from January 1, 2019 to March 3, 2020, or for a period of time better known to

Respondent, Respondent's monthly and annual glue usage exceeded the usage limits contained in Condition 9(a)(i) of FESOP No. 07110044.

49. By exceeding the monthly and annual glue usage requirements contained in Condition 9(a)(i) of FESOP No. 07110044, Respondent violated Condition 9(a)(i) of FESOP No. 07110044.

50. Condition 8(e) of FESOP No. 07110044 provides as follows:

The Permittee shall not cause or allow the use of a cleaning solution on a heatset-web-offset lithographic at this source unless the VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F).

51. According to information provided to Illinois EPA by Respondent in a report dated March 18, 2020, from January 1, 2019 to March 3, 2020, or for a period of time better known to Respondent, Respondent utilized a cleaning solution that had a vapor pressure greater than 10 mmHg at 20°C (68°F).

52. By utilizing a cleaning solution that had a vapor pressure greater than 10 mmHg at 20°C (68°F), Respondent violated Condition 8(e) of FESOP No. 07110044.

53. By violating Conditions 14(b), 8(c), 13(b), 17(a)(iv), 9(c), 20(a), 9(a)(i), and 8(e) of FESOP No. 07110044, Respondent violated Section 9(b) of the Act, 415 ILCS 5/9(b) (2018).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against Respondent, MASTER GRAPHICS, LLC, an Illinois limited liability company, with respect to Count III:

1. Authorizing a hearing in this matter at which time Respondent will be required to answer the allegations herein;

2. Finding that the Respondent violated Section 9(b) of the Act, 415 ILCS 5/9(b) (2018), and Conditions 14(b), 8(c), 13(b), 17(a)(iv), 9(c), 20(a), 9(a)(i), and 8(e) of FESOP No. 07110044;

3. Ordering the Respondent to cease and desist from any future violations of Section 9(b) of the Act, 415 ILCS 5/9(b) (2018), and Conditions 14(b), 8(c), 13(b), 17(a)(iv), 9(c), 20(a), 9(a)(i), and 8(e) of FESOP No. 07110044;

4. Assessing against the Respondent a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act and condition of FESOP No. 07110044, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;

5. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees against Respondent; and

6. Granting other such relief as the Board deems appropriate and just.

**COUNT IV**  
**FAILURE TO MAKE APPLICABILITY DETERMINATION**

1-21. Respondent realleges and incorporates herein by reference paragraphs 1 through 10 and 12 through 20 of Count I, and paragraphs 20 and 21 of Count III, as paragraphs 1 through 21 of this Count IV.

22. Section 9.1(d)(1) of the Act, 415 ILCS 5/9.1(d)(1) (2018), provides as follows:

No person shall:

- (1) violate any provisions of Sections 111, 112, 165, or 173 of the Clean Air Act, as now or hereafter amended, or federal regulations adopted pursuant thereto;

23. Section 112(d)(1) of the Clean Air Act (“CAA”), 42 U.S.C. § 7412(d)(1), provides, in pertinent part, as follows:

The Administrator shall promulgate regulations establishing emission standards



for each category or subcategory of major sources and area sources of hazardous air pollutants listed for regulation.

24. Pursuant to Section 112(d)(1) of the CAA, 42 U.S.C. § 7412(d)(1), the United States Environmental Protection Agency (“USEPA”) promulgated National Emission Standards for Hazardous Air Pollutants (“NESHAP”) for Source Categories, which are found in Chapter 40, Part 63 of the Code of Federal Regulation, 40 C.F.R. Part 63.

25. The provisions of NESHAP are enforceable by the Illinois EPA pursuant to Section 9.1(d)(1) of the Act, 415 ILCS 5/9.1(d)(1) (2018).

26. General provisions of NESHAP are found in Title 40, Chapter I, Subchapter C, Part 63, Subpart A of NESHAP for Source Categories, 40 C.F.R. § 63.1 *et seq.*, and codify the general rules and regulations pertaining to national emission standards.

27. Section 63.2 of Subpart A of the NESHAP, 40 C.F.R. § 63.2, provides the following definitions:

*Owner or operator* means any person who owns, leases, operates, controls, or supervises a stationary source.

*Stationary source* means any building, structure, facility, or installation which emits or may emit any air pollutant.

28. The Facility emits VOM and is therefore a stationary source as that term is defined in Section 63.2 of Subpart A of the NESHAP, 40 C.F.R. § 63.2.

29. Respondent is the owner and operator of a stationary source subject to Part 63 of NESHAP, 40 C.F.R. Part 63.

30. On December 4, 2002, USEPA promulgated NESHAP for the Paper and Other Web Coating Source Category that became effective that day and are found at Title 40, Chapter I, Subchapter C, Part 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, 40 C.F.R. § 63.3280 *et seq.*

31. Commercial printing operations that use web offset lithographic printing presses are in the Paper and Other Web Coating Source Category.

32. The Facility is in the Paper and Other Web Coating Source Category because it is a commercial printing operation that uses web offset lithographic printing presses.

33. Section 63.1(b) of Subpart A of the NESHAP, 40 C.F.R. § 63.1(b), provides, in pertinent part, as follows:

Initial applicability determination for this part.

(3) An owner or operator of a stationary source who is in the relevant source category and who determines that the source is not subject to a relevant standard or other requirement established under this part must keep a record as specified in § 63.10(b)(3).

34. Section 63.10(b)(3) of Subpart A of the NESHAP, 40 C.F.R. § 63.10(b)(3), provides, in pertinent part, as follows:

Recordkeeping requirement for applicability determinations. 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), 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 this part) 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 Administrator 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 this part for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under section 112, if any. The requirements to determine applicability of a standard under § 63.1(b)(3) and to record the results of that determination under paragraph (b)(3) of this section

shall not by themselves create an obligation for the owner or operator to obtain a title V permit.

35. Condition 15 of FESOP No. 07110044 provides as follows:

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 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.

36. At the time of the February 2019 Inspection, Respondent failed to produce an applicability determination that showed that the Facility is not subject to the National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, 40 C.F.R. § 63.3280 *et seq.*

37. By failing to keep a record of its applicability determination for the Facility, Respondent violated Section 63.10(b)(3) of Subpart A of the NESHAP, 40 C.F.R. § 63.10(b)(3), and Respondent thereby also violated Section 9.1(d) of the Act, 415 ILCS 5/9.1(d) (2018).

38. By failing to keep a record of the Facility's applicability determination, Respondent violated Condition 15 of FESOP No. 07110044, and Respondent thereby also violated Section 9(b) of the Act, 415 ILCS 5/9(b) (2018).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against Respondent, MASTER GRAPHICS, LLC, an Illinois limited liability company, with respect to Count IV:

1. Authorizing a hearing in this matter at which time Respondent will be required to answer the allegations herein;

2. Finding that the Respondent violated Sections 9.1(d)(1) and 9(b) of the Act, 415 ILCS 5/9.1(d)(1), and 9(b) (2018), Section 63.10(b)(3) of Subpart A of the NESHAP, 40 C.F.R. § 63.10(b)(3), and Condition 15 of FESOP No. 07110044;

3. Ordering the Respondent to cease and desist from any future violations of Sections 9.1(d)(1) and 9(b) of the Act, 415 ILCS 5/9.1(d)(1), and 9(b) (2018), Section 63.10(b)(3) of Subpart A of the NESHAP, 40 C.F.R. § 63.10(b)(3), and Condition 15 of FESOP No. 07110044.

4. Assessing against the Respondent a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act and condition of FESOP No. 07110044, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;

5. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees against Respondent; and

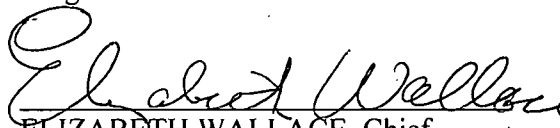
6. Granting such other relief as the Board deems appropriate and just.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS  
by KWAME RAOUL, Attorney General  
of the State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement/Asbestos  
Litigation Division

BY:

  
ELIZABETH WALLACE, Chief  
Environmental Bureau

Of Counsel:

Daniel I. Rottenberg  
Assistant Attorney General  
Environmental Bureau  
69 West Washington Street, 18th Floor  
Chicago, Illinois 60602  
(312) 814-3816  
Primary: drottenberg@atg.state.il.us  
Secondary: mcacaccio@atg.state.il.us

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB No. 20-
	)	(Enforcement - _____)
MASTER GRAPHICS, LLC,	)	
an Illinois limited liability company,	)	
	)	
Respondent.	)	

**MOTION FOR RELIEF FROM HEARING REQUIREMENT  
AND NOTICE OF ELECTRONIC SERVICE**

NOW COMES Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, and pursuant to Section 31(c)(2) of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31(c)(2) (2018), moves that the Illinois Pollution Control Board (“Board”) grant the parties in the above-captioned matter relief from the hearing requirement imposed by Section 31(c)(1) of the Act, 415 ILCS 5/31(c)(1) (2018). In support of this motion, Complainant states as follows:

1. The Complaint in this matter alleges violations of Section 9(b) of the Act, 415 ILCS 5/9(b) (2018), Section 201.142 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.142, Section 201.143 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.143, Conditions 14(b), 8(c), 13(b), 17(a)(iv), 9(c), 20(a), 9(a)(i), 8(e), and 15 of FESOP No. 07110044, Section 9.1(d)(1) of the Act, 415 ILCS 5/9.1(d)(1) (2018), and Section 63.10(b)(3) of Subpart A of the NESHAP, 40 C.F.R. § 63.10(b)(3).
2. Complainant is filing the Complaint with the Board simultaneous with this Motion and a Stipulation and Proposal for Settlement.
3. Due to the challenges presented by the COVID-19 pandemic, the Respondent has

agreed to accept service of the Complaint via electronic mail. A true and correct copy of the agreement to accept service via electronic mail is attached hereto as Exhibit 1.

4. The parties have reached agreement on all outstanding issues in this matter.

5. This agreement is presented to the Board in a Stipulation and Proposal for Settlement filed this same date.

6. All parties agree that a hearing on the Stipulation and Proposal for Settlement is not necessary, and respectfully request relief from such a hearing as allowed by Section 31(c)(2) of the Act, 415 ILCS 5/31(c)(2) (2018).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, hereby requests that the Board grant this motion for relief from the hearing requirement set forth in Section 31(c)(1) of the Act, 415 ILCS 5/31(c)(1) (2018).

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

KWAME RAOUL  
Attorney General  
State of Illinois

BY: /s/ Daniel Rottenberg  
Daniel Rottenberg  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General's Office  
69 W. Washington Street, Suite 1800  
Chicago, Illinois 60602  
(312) 814-3816  
drottenberg@atg.state.il.us  
Secondary e-mail address: mcacaccio@atg.state.il.us

DATE: June 30, 2020

Gering, Charles <cgering@pedersenhoupt.com>

Thu 6/25/2020 11:22 AM

To: Rottenberg, Daniel <DRottenberg@atg.state.il.us>;

Daniel,

Yes, as we discussed, I will accept electronic service on behalf of Master Graphics.

Chuck

**Pedersen**

Pedersen & Houpt

Charles M. Gering  
Attorney at Law  
161 North Clark Street, Suite 2700  
Chicago, Illinois 60601  
312-261-2165  
cgering@pedersenhoupt.com

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Information contained in this e-mail transmission is privileged and confidential. If you are not the intended recipient, do not read, distribute or reproduce this transmission (including any attachments). If you have received this e-mail in error, please notify the sender by e-mail reply.  
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**From:** Rottenberg, Daniel [mailto:DRottenberg@atg.state.il.us]  
**Sent:** Thursday, June 25, 2020 11:18 AM  
**To:** Gering, Charles  
**Subject:** Electronic Service of Board Complaint

Chuck,

I am confirming that Master Graphics agrees to accept service of the complaint via electronic mail due to the challenges presented by the COVID-19 pandemic.

Thank you!

Daniel Rottenberg



**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB No. 20-
	)	(Enforcement - _____)
MASTER GRAPHICS, LLC,	)	
an Illinois limited liability company,	)	
	)	
Respondent.	)	

**STIPULATION AND PROPOSAL FOR SETTLEMENT**

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“Illinois EPA”), and MASTER GRAPHICS, LLC, an Illinois limited liability company (“Respondent”), (collectively “Parties to the Stipulation”), have agreed to the making of this Stipulation and Proposal for Settlement (“Stipulation”) and submit it to the Illinois Pollution Control Board (“Board”) for approval. This stipulation of facts is made and agreed upon for purposes of settlement only and as a factual basis for the Board’s approval of this Stipulation and issuance of relief. None of the facts stipulated herein shall be introduced into evidence in any other proceeding regarding the violations of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/1, et seq. (2018), and the Board’s regulations, alleged in the Complaint except as otherwise provided herein. It is the intent of the Parties to the Stipulation that it be a final adjudication of this matter.

**I. STATEMENT OF FACTS**

**A. Parties**

1. On June 30, 2020, a Complaint was filed on behalf of the People of the State of Illinois by Kwame Raoul, Attorney General of the State of Illinois, on his own motion and upon

the request of the Illinois EPA, pursuant to Section 31 of the Act, 415 ILCS 5/31 (2018), against the Respondent.

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2018).

3. At all times relevant to the Complaint, Respondent was and is an Illinois limited liability company that is authorized to transact business in the State of Illinois.

4. At all times relevant to the Complaint, Respondent has been and remains the operator of a lithographic printing facility located at 1100 South Main Street, Rochelle, Ogle County, Illinois ("Facility").

**B. Allegations of Non-Compliance**

Complainant contends that the Respondent has violated the following provisions of the Act and Board regulations:

- Count I: Constructing an emissions source without obtaining a construction permit issued by the Illinois EPA, in violation of Section 9(b) of the Act, 415 ILCS 5/9(b) (2018), and Section 201.142 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.142.
- Count II: Operating an emissions source without obtaining the requisite operating permit issued by the Illinois EPA, in violation of Section 9(b) of the Act, 415 ILCS 5/9(b) (2018), and Section 201.143 of the Board Air Pollution Regulations, 35 Ill. Adm. Code. 201.143.
- Count III: Violating Conditions 8(c), 14(b), 13(b), 17(a)(iv), 9(c), 20(a), 9(a)(i), and 8(e) of Federally Enforceable State Operating Permit ("FESOP") No. 07110044, thereby violating Section 9(b) of the Act, 415 ILCS 5/9(b) (2018).
- Count IV: Failing to keep a record of its National Emission Standards for Hazardous Air Pollutants ("NESHAP") applicability determination for the Facility, in violation of Sections 9.1(d)(1) and 9(b) of the Act, 415 ILCS 5/9.1(d)(1), and 9(b) (2018), Section 63.10(b)(3) of Subpart A of the NESHAP, 40 C.F.R. § 63.10(b)(3), and Condition 15 of FESOP No. 07110044.

**C. Non-Admission of Violations**

The Respondent represents that it has entered into this Stipulation for the purpose of settling and compromising disputed claims without having to incur the expense of contested litigation. By entering into this Stipulation and complying with its terms, the Respondent does not admit the allegations of violation within the Complaint and referenced within Section I.B herein, and this Stipulation shall not be interpreted as including such admission.

**D. Compliance Activities to Date**

1. On March 11, 2020, the Respondent provided Illinois EPA with records and other materials requested by Illinois EPA.

2. On April 14, 2020, the Respondent submitted a Permit Revision Application for a FESOP Source to Illinois EPA.

**II. APPLICABILITY**

This Stipulation shall apply to and be binding upon the Parties to the Stipulation. The Respondent shall not raise as a defense to any enforcement action taken pursuant to this Stipulation the failure of any of its officers, directors, agents, employees or successors or assigns to take such action as shall be required to comply with the provisions of this Stipulation. This Stipulation may be used against the Respondent in any subsequent enforcement action or permit proceeding as proof of a past adjudication of violation of the Act and the Board Regulations for all violations alleged in the Complaint in this matter, for purposes of Sections 39 and 42 of the Act, 415 ILCS 5/39 and 42 (2018).

**III. IMPACT ON THE PUBLIC RESULTING FROM ALLEGED NON-COMPLIANCE**

Section 33(c) of the Act, 415 ILCS 5/33(c) (2018), provides as follows:

In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing upon the reasonableness of the emissions, discharges, or deposits involved including, but not limited to:

1. the character and degree of injury to, or interference with the protection of the health, general welfare and physical property of the people;
2. the social and economic value of the pollution source;
3. the suitability or unsuitability of the pollution source to the area in which it is located, including the question of priority of location in the area involved;
4. the technical practicability and economic reasonableness of reducing or eliminating the emissions, discharges or deposits resulting from such pollution source; and
5. any subsequent compliance.

In response to these factors, the Parties to the Stipulation state the following:

1. Human health and the environment were threatened and the Illinois EPA's information gathering responsibilities hindered by the Respondent's violations alleged in the Complaint.
2. There is social and economic benefit to the Facility.
3. Operation of the Facility was and is suitable for the area in which it is located.
4. Obtaining a permit prior to construction at the site and compliance with its terms is both technically practicable and economically reasonable.
5. Respondent has subsequently complied with the Act and the Board regulations.

#### **IV. CONSIDERATION OF SECTION 42(h) FACTORS**

Section 42(h) of the Act, 415 ILCS 5/42(h) (2018), provides as follows:

In determining the appropriate civil penalty to be imposed under . . . this Section, the Board is authorized to consider any matters of record in mitigation or aggravation of penalty, including but not limited to the following factors:

1. the duration and gravity of the violation;

2. the presence or absence of due diligence on the part of the respondent in attempting to comply with requirements of this Act and regulations thereunder or to secure relief therefrom as provided by this Act;
3. any economic benefits accrued by the respondent because of delay in compliance with requirements, in which case the economic benefits shall be determined by the lowest cost alternative for achieving compliance;
4. the amount of monetary penalty which will serve to deter further violations by the respondent and to otherwise aid in enhancing voluntary compliance with this Act by the respondent and other persons similarly subject to the Act;
5. the number, proximity in time, and gravity of previously adjudicated violations of this Act by the respondent;
6. whether the respondent voluntarily self-disclosed, in accordance with subsection i of this Section, the non-compliance to the Agency;
7. whether the respondent has agreed to undertake a “supplemental environmental project”, which means an environmentally beneficial project that a respondent agrees to undertake in settlement of an enforcement action brought under this Act, but which the respondent is not otherwise legally required to perform; and
8. whether the respondent has successfully completed a Compliance Commitment Agreement under subsection (a) of Section 31 of this Act to remedy the violations that are the subject of the complaint.

In response to these factors, the Parties to the Stipulation state as follows:

1. Complainant alleges that Respondent failed to obtain a permit for construction site activities prior to beginning construction activities at the site and violated provisions of its existing operating permit. The alleged violations began on or around May 2018, and were individually resolved at various times in the following year.

2. Respondent was diligent in attempting to come back into compliance with the Act, Board regulations and applicable federal regulations, once the Illinois EPA notified it of its noncompliance as alleged in the Complaint.

3. The civil penalty takes into account any economic benefit realized by the Respondent as a result of avoided or delayed compliance as alleged in the Complaint.

4. Complainant has determined, based upon the specific facts of this matter, that a penalty of Thirty-Four Thousand Five Hundred Dollars (\$34,500.00) will serve to deter further violations and aid in future voluntary compliance with the Act and Board regulations.

5. To Complainant's knowledge, Respondent has no previously adjudicated violations of the Act.

6. Self-disclosure is not at issue in this matter.

7. The settlement of this matter does not include a supplemental environmental project.

8. A Compliance Commitment Agreement was not at issue in this matter.

## V. TERMS OF SETTLEMENT

### A. **Penalty Payment**

1. The Respondent shall pay a civil penalty in the sum of Thirty-Four Thousand Five Hundred Dollars (\$34,500.00) within thirty (30) days from the date the Board adopts and accepts this Stipulation.

### B. **Interest and Default**

1. If the Respondent fails to make any payment required by this Stipulation on or before the date upon which the payment is due, the Respondent shall be in default and the remaining unpaid balance of the penalty, plus any accrued interest, shall be due and owing immediately. In the event of default, the Complainant shall be entitled to reasonable costs of collection, including reasonable attorney's fees.

2. Pursuant to Section 42(g) of the Act, interest shall accrue on any penalty amount

owed by the Respondent not paid within the time prescribed herein. Interest on unpaid penalties shall begin to accrue from the date such are due and continue to accrue to the date full payment is received. Where partial payment is made on any penalty amount that is due, such partial payment shall be first applied to any interest on unpaid penalties then owing.

**C. Payment Procedures**

1. All payments required by this Stipulation shall be made by certified check or money order payable to the Illinois EPA for deposit into the Environmental Protection Trust Fund (“EPTF”). Payments shall be sent by first class mail and delivered to:

Illinois Environmental Protection Agency  
Fiscal Services  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

2. The case name and case number shall appear on the face of the certified check or money order.

3. A copy of the certified check or money order and any transmittal letter shall be sent to:

Daniel I. Rottenberg  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General’s Office  
69 W. Washington Street, Suite 1800  
Chicago, Illinois 60602

**D. Future Compliance**

1. Respondent shall promptly respond to any and all Illinois EPA requests regarding the pending Permit Revision Application for FESOP, and, upon issuance, shall comply with the terms and conditions of the FESOP.

2. In addition to any other authorities, the Illinois EPA, its employees and

representatives, and the Attorney General, his employees and representatives, shall have the right of entry into and upon the Respondent's facility which is the subject of this Stipulation, at all reasonable times for the purposes of conducting inspections and evaluating compliance status. In conducting such inspections, the Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, may take photographs, samples, and collect information, as they deem necessary.

3. This Stipulation in no way affects the responsibilities of the Respondent to comply with any other federal, state or local laws or regulations, including but not limited to the Act and the Board Regulations.

4. The Respondent shall cease and desist from future violations of the Act and Board Regulations that were the subject matter of the Complaint.

**E. Release from Liability**

In consideration of the Respondent's payment of the \$34,500.00 penalty, its commitment to cease and desist as contained in Section V.D.4 above, completion of all activities required hereunder, and upon the Board's approval of this Stipulation, the Complainant releases, waives and discharges the Respondent from any further liability or penalties for the alleged violations of the Act and Board regulations that were the subject matter of the Complaint herein. The release set forth above does not extend to any matters other than those expressly specified in Complainant's Complaint filed on June 30, 2020. The Complainant reserves, and this Stipulation is without prejudice to, all rights of the State of Illinois against the Respondent with respect to all other matters, including but not limited to, the following:

- a. criminal liability;
- b. liability for future violation of state, federal, local, and common laws and/or regulations;



- c. liability for natural resources damage arising out of the alleged violations; and
- d. liability or claims based on the Respondent's failure to satisfy the requirements of this Stipulation.

Nothing in this Stipulation is intended as a waiver, discharge, release, or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which the State of Illinois may have against any person, as defined by Section 3.315 of the Act, 415 ILCS 5/3.315, or entity other than the Respondent.

**F. Enforcement and Modification of Stipulation**

Upon the entry of the Board's Order approving and accepting this Stipulation, that Order is a binding and enforceable order of the Board and may be enforced as such through any and all available means.

**G. Execution of Stipulation**

The undersigned representatives for the Parties to the Stipulation certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of this Stipulation and to legally bind them to it.

WHEREFORE, the Parties to the Stipulation request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.

PEOPLE OF THE STATE OF ILLINOIS

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

KWAME RAOUL  
Attorney General  
State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement/  
Asbestos Litigation Division

JOHN J. KIM, Director  
Illinois Environmental Protection Agency

BY: *Elizabeth Wallace*  
ELIZABETH WALLACE, Chief  
Assistant Attorney General  
Environmental Bureau

BY: *Charles W. Gunnarson*  
CHARLES W. GUNNARSON  
Chief Legal Counsel

DATE: 6/25/20

DATE: 6/23/2020

MASTER GRAPHICS, LLC  
RESPONDENT

By: \_\_\_\_\_

Its: \_\_\_\_\_

DATE: \_\_\_\_\_

WHEREFORE, the Parties to the Stipulation request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.

PEOPLE OF THE STATE OF ILLINOIS

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

KWAME RAOUL  
Attorney General  
State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement/  
Asbestos Litigation Division

JOHN J. KIM, Director  
Illinois Environmental Protection Agency

BY: \_\_\_\_\_  
ELIZABETH WALLACE, Chief  
Assistant Attorney General  
Environmental Bureau

BY: \_\_\_\_\_  
CHARLES W. GUNNARSON  
Chief Legal Counsel

DATE: \_\_\_\_\_

DATE: \_\_\_\_\_

MASTER GRAPHICS, LLC  
RESPONDENT

By: 

Its: C.E.O

DATE: 6/25/2020