

ORIGINAL

ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

MAY 12 2004

STATE OF ILLINOIS
Pollution Control Board

IN THE MATTER OF:

CLEAN-UP PART III AMENDMENTS TO)
35 ILL. ADM. CODE PARTS 211, 218, AND) R04-20
219) (Rulemaking - Air)

IN THE MATTER OF:

TECHNICAL CORRECTIONS TO)
FORMULAS IN 35 ILL. ADM. CODE 214) R04-12
"SULFUR LIMITATIONS") (Rulemaking - Air)
(Consolidated)

HEARING EXHIBITS

First Hearing: Chicago March 18, 2004

Hearing Exhibit 1

Five Board orders that bear upon proposed amendments to equations: (1) May 25, 1978, in R75-5, R74-2; (2) Dec. 14, 1978, in R75-5, R74-2; (3) Feb. 15, 1979, in R75-5, R74-2; (4) Feb. 24, 1983, in R80-22; and (5) Apr. 20, 1995, R94-31.

Second Hearing: Springfield May 6, 2004

Hearing Exhibit 2

Illinois EPA's "ERRATA Sheet," showing proposed changes in underline/strikeout to the rule language originally set forth in the R04-20 proposal.

ORIGINAL

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

MAY 12 2004

STATE OF ILLINOIS
Pollution Control Board

IN THE MATTER OF:)	
)	
CLEAN-UP PART III)	R04-20
AMENDMENTS TO 35 ILL.)	(Rulemaking - Air)
ADM. CODE PARTS 211, 218 AND 219)	
)	

ERRATA SHEET

NOW COMES the Proponent, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("Illinois EPA"), by its attorney, Charles E. Matoesian, and submits this Errata Sheet to the Illinois Pollution Control Board ("Board") in this matter to request the Board to make modifications to the original proposal. Changes are marked with underlining and strikeouts from the original proposal.

Part 218:

218.105(c)(2)(E): The Illinois EPA proposes adding the language "using the DQO/LCL alternative protocol and"

- E) Mass balance using DQO/LCL. For a liquid/gas input where an owner or operator is using the DQO/LCL alternative protocol and not using an enclosure as described in Method 204 of Appendix M of 40 CFR Part 51, the VOM content of the liquid input (L) shall be determined using Method 204A or 204F in Appendix M of 40 CFR Part 51. The VOM content of the captured gas stream (G) to the control device shall be determined using either Method 204B or 204C in Appendix M of 40 CFR Part 51. The results of capture efficiency calculations (G/L) are to be subjected to and shall satisfy the DQO or LCL statistical analysis methodology as described in Section 3 of USEPA's *Guidelines for Determining Capture Efficiency*, incorporated by reference at 218.112 of this Part. Failure to satisfy the DQO shall require capture efficiency to be determined using one of the protocols described in subsections (c)(2)(A), (B), (C), or (D) above.

218.105(c)(2): The Illinois EPA proposes striking the last sentence and adding the language "compliance demonstrations arising in enforcement matters," to the new last sentence.

R04-12, R04-20
Exh. 2 RRM 5/6/04

2) Capture Efficiency Protocols

The capture efficiency of an emission unit shall be measured using one of the protocols given below. Appropriate test methods to be utilized in each of the capture efficiency protocols are described in Appendix M of 40 CFR Part 51 incorporated by reference at 218.112. Any error margin associated with a test method or protocol may not be incorporated into the results of a capture efficiency test. If these techniques are not suitable for a particular process, then an alternative capture efficiency protocol may be used, pursuant to the provisions of Section 218.108(b) of this Part. For purposes of determining capture efficiency using an alternative protocol, sources shall satisfy the data quality objective (DQO) or the lower confidence level (LCL) statistical analysis methodologies as presented in USEPA's "Guidelines for Determining Capture Efficiency" incorporated by reference at Section 218.112 of this Part. LCL can be used to establish compliance with capture efficiency requirements. For purposes of establishing emission credits for offsets, shutdowns, trading, and compliance demonstrations arising in enforcement matters, the DQO must be satisfied. ~~In enforcement cases, LCL can not be used to establish compliance. Sufficient tests must be performed to satisfy the DQO.~~

218.406(b)(1)(A)(ii): The Illinois EPA proposes to correct the formula to read, "E_p"

- ii) Calculations which demonstrate that total maximum theoretical emissions of VOM from all heatset web offset lithographic printing lines at the source never exceed 90.7 Mg (100 tons) per calendar year before the application of air pollution control equipment. Total maximum theoretical emissions of VOM for a heatset web offset lithographic printing source is the sum of maximum theoretical emissions of VOM from each heatset web offset lithographic printing line at the source. The following equation shall be used to calculate total maximum theoretical emissions of VOM per calendar year in the absence of air pollution control equipment for each heatset web offset lithographic printing line at the source:

$$\Sigma_p E_p = (R \times A \times B) + [(C \times D) + 1095 (F \times G \times H)]$$

where:

$\Sigma_p E_p$ = Total maximum theoretical emissions of VOM from one heatset web offset printing line in units of kg/yr (lb/yr);

A = Weight of VOM per volume of solids of ink with the highest VOM content as applied each year on the printing line in units of kg/l (lb/gal) of solids;

B = Total volume of solids for all inks that can potentially be applied each year on the printing line in units of l/yr (gal/yr). The instrument or method by which the owner or operator accurately measured or calculated the volume of each ink as applied and the amount that can potentially be applied each year on the printing line shall be described in the certification to the Agency;

C = Weight of VOM per volume of fountain solution with the highest VOM content as applied each year on the printing line in units of kg/l (lb/gal);

D = The total volume of fountain solution that can potentially be used each year on the printing line in units of l/yr (gal/yr). The instrument and/or method by which the owner or operator accurately measured or calculated the volume of each fountain solution used and the amount that can potentially be used each year on the printing line shall be described in the certification to the Agency;

F = Weight of VOM per volume of material for the cleanup material or solvent with the highest VOM content as used each year on the printing line in units of Kg/l (lb/gal) of such material;

G = The greatest volume of cleanup material or solvent used in any 8-hour period; and

H = The highest fraction of cleanup material or solvent which is not recycled or recovered for offsite disposal during any 8-hour period.

R = The multiplier representing the amount of VOM not retained in the substrate being used. For paper, R = 0.8. For foil, plastic, or other impervious substrates, R = 1.0.

218.411(a)(1)(B)(iii): The Illinois EPA proposes to replace the word "retention" with "emission adjustment".

- iii) To determine VOM emissions from inks used on lithographic printing line(s) at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks except when using an impervious substrate, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate except when using an impervious substrate. For impervious substrates such as metal or plastic, no ~~retention~~ emission adjustment factor is used. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing line(s); and

Part 219:

219.105(c)(2)(E): The Illinois EPA proposes adding the language "using the DQO/LCL alternative protocol and"

- F) Mass balance using DQO/LCL. For a liquid/gas input where an owner or operator is using the DQO/LCL alternative protocol and not using an enclosure as described in Method 204 of Appendix M of 40 CFR Part 51, the VOM content of the liquid input (L) shall be determined using Method 204A or 204F in Appendix M of 40 CFR

Part 51. The VOM content of the captured gas stream (G) to the control device shall be determined using either Method 204B or 204C in Appendix M of 40 CFR Part 51. The results of capture efficiency calculations (G/L) are to be subjected to and shall satisfy the DQO or LCL statistical analysis methodology as described in Section 3 of USEPA's *Guidelines for Determining Capture Efficiency*, incorporated by reference at 218.112 of this Part. Failure to satisfy the DQO shall require capture efficiency to be determined using one of the protocols described in subsections (c)(2)(A), (B), (C), or (D) above.

219.105(c)(2): The Illinois EPA proposes striking the last sentence^{two} and adding the language "compliance demonstrations arising in enforcement matters," to the new last sentence. *KRM RKM*

2) Capture Efficiency Protocols

The capture efficiency of an emission unit shall be measured using one of the protocols given below. Appropriate test methods to be utilized in each of the capture efficiency protocols are described in Appendix M of 40 CFR Part 51 incorporated by reference at 218.112. Any error margin associated with a test method or protocol may not be incorporated into the results of a capture efficiency test. If these techniques are not suitable for a particular process, then an alternative capture efficiency protocol may be used, pursuant to the provisions of Section 218.108(b) of this Part. For purposes of determining capture efficiency using an alternative protocol, sources shall satisfy the data quality objective (DQO) or the lower confidence level (LCL) statistical analysis methodologies as presented in USEPA's "Guidelines for Determining Capture Efficiency" incorporated by reference at Section 218.112 of this Part. LCL can be used to establish compliance with capture efficiency requirements. For purposes of establishing emission credits for offsets, shutdowns, trading, and compliance demonstrations arising in enforcement matters, the DQO must be satisfied. ~~In enforcement cases, LCL can not be used to establish compliance. Sufficient tests must be performed to satisfy the DQO.~~

219.406(b)(1)(A)(ii): The Illinois EPA proposes to correct the formula to read, "E_p"

- ii) Calculations which demonstrate that total maximum theoretical emissions of VOM from all heatset web offset lithographic printing lines at the source never exceed 90.7 Mg (100 tons) per calendar year before the application of air pollution control equipment. Total maximum theoretical emissions of VOM for a heatset web offset lithographic printing source is the sum of maximum theoretical emissions of VOM from each heatset web offset lithographic printing line at the source. The following equation shall be used to calculate total maximum theoretical emissions of VOM per calendar year in the absence of air pollution control equipment for each heatset web offset lithographic printing line at the source:

$$\Sigma_p E_p = (R \times A \times B) + [(C \times D) + 1095 (F \times G \times H)]$$

where:

$\Sigma_p E_p$ = Total maximum theoretical emissions of VOM from one heatset web offset printing line in units of kg/yr (lb/yr);

A = Weight of VOM per volume of solids of ink with the highest VOM content as applied each year on the printing line in units of kg/l (lb/gal) of solids;

B = Total volume of solids for all inks that can potentially be applied each year on the printing line in units of 1/yr (gal/yr). The instrument or method by which the owner or operator accurately measured or calculated the volume of each ink as applied and the amount that can potentially be applied each year on the printing line shall be described in the certification to the Agency;

C = Weight of VOM per volume of fountain solution with the highest VOM content as applied each year on the printing line in units of kg/l (lb/gal);

D = The total volume of fountain solution that can potentially be used each year on the printing line in units of 1/yr (gal/yr). The

instrument and/or method by which the owner or operator accurately measured or calculated the volume of each fountain solution used and the amount that can potentially be used each year on the printing line shall be described in the certification to the Agency;

- F = Weight of VOM per volume of material for the cleanup material or solvent with the highest VOM content as used each year on the printing line in units of Kg/l (lb/gal) of such material;
- G = The greatest volume of cleanup material or solvent used in any 8-hour period; and
- H = The highest fraction of cleanup material or solvent which is not recycled or recovered for offsite disposal during any 8-hour period.
- R = The multiplier representing the amount of VOM not retained in the substrate being used. For paper, R = 0.8. For foil, plastic, or other impervious substrates, R = 1.0.

219.411(a)(1)(B)(iii): The Illinois EPA proposes to replace the word "retention" with "emission adjustment".

- iii) To determine VOM emissions from inks used on lithographic printing line(s) at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks except when using an impervious substrate, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate except when using an impervious substrate. For impervious substrates such as metal or plastic, no ~~retention~~ emission adjustment factor is used. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing line(s); and