BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
REASONABLY AVAILABLE CONTROL	)	R10-8
TECHNOLOGY (RACT) FOR VOLATILE	)	(Rulemaking-Air)
ORGANIC MATERIAL EMISSIONS FROM	)	
GROUP II CONSUMER & COMMERCIAL	)	
PRODUCTS: PROPOSED AMENDMENTS	)	
TO 35 ILL. ADM. CODE 211, 218, and 219	)	

NOTICE

To: John Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601-3218

SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have today filed with the Office of the Pollution Control Board the TESTIMONY OF DAVID BLOOMBERG and MOTION TO AMEND RULEMAKING PROPOSAL of the Illinois Environmental Protection Agency, copies of which are herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: Dana Vetterhoffer
Dana Vetterhoffer
Assistant Counsel
Division of Legal Counsel

DATED: September 14, 2009

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(217) 782-5544

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TESTIMONY OF DAVID BLOOMBERG

My name is David E. Bloomberg. I am employed by the Illinois Environmental Protection Agency ("Illinois EPA" or "Agency") as the Compliance Unit Manager in the Compliance Section within the Division of Air Pollution Control. I have been at the Agency in this capacity for over five years, and was previously an Environmental Protection Engineer in the Air Quality Planning Section for twelve and a half years.

My academic credentials include a Bachelor of Science degree in ceramic engineering from the University of Illinois at Champaign-Urbana, as well as completion of all graduate coursework required for a Master's degree in the same area of study. I have also completed numerous environmental courses over the years and provided training on air pollution compliance issues to industry personnel and environmental consultants.

Among my duties, I wrote the technical support document ("TSD") and co-wrote the regulatory language for this rulemaking proposal, and did likewise for previous rulemakings involving lithographic printing and several coating categories. I have also been the Agency's main contact for interpretations and questions involving these rules and other regulations covering printing

and coating for over 14 years. In that role and as part of my Compliance Unit Manager responsibilities, I have also participated in both adjusted standard and enforcement hearings involving sources engaged in the printing of flexible packaging. In addition, I have been involved in designing, writing, implementing, and enforcing a wide variety of air pollution regulations, including those for mercury, NOx trading, the Clean Air Interstate Rule, and the Emissions Reduction Market System.

My duties as the Compliance Unit Manager involve supervision of the Bureau of Air staff who review documents submitted by sources, such as exceedance, semi-annual, and annual compliance reports, as well as those who review emissions tests, and I sign off on all such reviews before they are finalized. In addition, I participate in decisions regarding enforcement of the Board's air pollution regulations and oversee the process of sending out Violation Notices and related activities.

I am here today to provide testimony and to answer questions pertaining to the Group II Volatile Organic Materials ("VOM") Control Techniques Guidelines ("CTGs") regulations that the Agency has proposed. A more extensive discussion of these proposed modifications can be found in the TSD and Statement of Reasons, but I will summarize them briefly again here.

These proposals address the same categories as those covered by the United States Environmental Protection Agency ("USEPA") in what is known collectively as the Consumer and Commercial Products, Group II, which includes lithographic printing, letterpress printing, flexible packaging printing, flat wood paneling coating, and industrial cleaning solvents.

Section 172 of the Clean Air Act ("CAA") requires that state implementation plans ("SIPs") for nonattainment areas, such as the Chicago and Metro-East St. Louis nonattainment areas ("NAAs") in Illinois, must include requirements for "reasonably available control technology" ("RACT") as it applies to emissions sources. Section 182(b)(2)(A) of the CAA further requires that SIPs be revised to include RACT for VOM emissions sources that are covered by a CTG document issued by USEPA after November 15, 1990, and before the area's date of attainment.

The USEPA defines RACT as "the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility." In developing the CTGs for the categories covered by this rulemaking, USEPA evaluated the sources of VOM emissions from the applicable industries, the available control possibilities to address the associated emissions, and the cost of such control measures. Illinois EPA based much of its proposal on these CTGs and on USEPA research.

Lithographic Printing

Proposed changes to the lithographic printing regulations involve modifications to control requirements for heatset web offset lithographic printers as well as changes to fountain solution and cleaning solution limitations for all subject units. In addition, the requirements for cleaning solutions and fountain solutions are being extended to sources with lower emissions. All of these

changes have been determined to be RACT by USEPA, and Illinois EPA's experience with control devices on lithographic printing sources correlates with that determination.

In order to reduce the burden on smaller sources, and as a result of discussions with industry representatives, exclusions to the cleaning solution and fountain solution requirements have been included in this proposal. Sources may make use of such exclusions if they fall into the listed categories. Specifically, the exclusions apply to sources that emit between 15 and 100 pounds per day of VOM and include sheet-fed presses that print substrates no larger than 11 inches by 17 inches and any lithographic press with a fountain solution reservoir of no larger than one gallon. In addition, all sources in this emission range will be able to use up to 110 gallons of cleaning solution per year that do not meet either the VOM content or vapor pressure requirements. Sources may choose to opt out of these exclusions if they do not wish to make use of them, and thus would not need to keep the records required of those utilizing the exclusions. In addition, discussions with industry led the Agency to propose a new method of calculating applicability based on material use, which may be easier for some sources.

Another change to the lithographic printing regulation that aids sources is the specification of VOM retention factors. The existing regulation recognizes that the substrate retains some of the VOM present in the ink, and thus a retention factor of 0.95 is used when calculating emissions from non-heatset inks, while a factor of 0.20 is used when calculating emissions from heatset inks. The proposed modification contains a factor recognizing that VOM also remains on solvent-laden rags that are stored and disposed of properly. These factors continue to be allowed for determination of applicability. In addition, this proposal adds emission adjustment factors to

be used in other situations when not determining applicability (such as for Annual Emissions Reports and permit limits). These factors take into account carryover of VOM from automatic blanket wash and fountain solutions into the dryer and control device.

Letterpress Printing

While there are very few letterpress operations in Illinois NAAs, and apparently no heatset letterpress units, the State is still required to promulgate the CTG regulations for this category. Letterpress emission sources are similar to those for lithographic printing, with the exception that letterpress operations do not use a fountain solution. In addition, letterpress printing presses are often operated at the same source as lithographic printing and many of the control options for letterpress printing are the same as the control options for lithographic printing as well. This is especially true in terms of cleaning solutions. As such, the proposed rule would adopt most of the RACT recommendations of the CTG. It should be noted that, unlike for larger lithographic printing sources, the Agency is proposing to use the cleaning solution 70 percent VOM content limit for all subject letterpress units, as letterpress operations have never been specifically regulated in Illinois before and thus there are no concerns about loosening existing standards.

Flexible Packaging Printing

The modifications being proposed for flexible package printing appear in the sections that currently cover all rotogravure and flexographic printing; however, these modifications only apply to this specific subcategory of printing operations.

The proposed changes focus on reducing VOM emissions from inks and cleaning operations. Ink emissions must be reduced either through a lower VOM content or by a control device, where the percentage reduction required of an add-on control varies depending on when the press and control were constructed at the site. The approach to reducing VOM emissions from cleaning materials focuses on work practices, and thus there is no specific numeric limit that applies; however, the applicability level for such work practices is much lower, at 15 pounds per day, as compared to the applicability thresholds of 25 tons per year potential to emit or 100 tons per year maximum theoretical emissions for the remainder of the rule.

Industrial Cleaning Solvents

The industrial cleaning solvents category encompasses many products and cleaning styles that are used to clean dirt, soil, oil, and grease, as well as remove adhesives, paints, and inks. The proposed rule thus covers a wide range of cleaning activities. The proposal follows USEPA's CTG in the applicability threshold of 15 pounds per day of VOM emissions and in most of the required VOM limits. The CTG recommends a content limit of 50 grams VOM per liter (0.42 lb/gal) of cleaning material for those industries that are not already covered, and are not to be covered, by a CTG. However, there are some cases where the Illinois EPA has received USEPA permission to use higher limits – or indeed to exempt the type of operation entirely – in response to industry representatives' comments regarding issues specific to certain categories of cleaning. In addition, there is an alternate vapor pressure limit of 8 mm Hg at 20 degrees Celsius that may be used in place of the 50 gram limit. Furthermore, cleaning solvent emissions can also be

reduced by add-on controls, modifying equipment, or changing the method of cleaning such that an overall control efficiency of 85 percent reduction in emissions of cleaning solvent VOM is achieved.

In addition to the limits discussed above, all subject sources must make use of certain work practices to reduce emissions. General work practices include keeping solvent containers and used applicators covered; properly storing and disposing of spent solvents and used cleaning rags; minimizing air circulation around all cleaning operations; and implementing equipment practices that reduce emissions, e.g., leak detection and repair practices.

Flat Wood Paneling Coating

The category of flat wood paneling coating has not been previously covered in Illinois' regulations (though some products that will now be defined as flat wood paneling may have been previously covered under the wood furniture coating regulations). As with most coating categories, the two main options for compliance are the use of lower-VOM coatings or add-on controls. Illinois EPA is using the VOM content limits and control efficiencies that USEPA determined in the CTG to be RACT.

In addition, work practices related to cleaning operations will apply to this category. Some of these requirements are already in place within the existing regulations for wood furniture coaters. Under the Agency's proposal, these will apply to flat wood paneling coaters as well, as will several other specific requirements.

Conclusions

The Agency believes these proposed changes to be largely non-controversial, as they stem from USEPA's determination of RACT that applies to these categories of sources nationwide. The Agency agrees with USEPA that all the proposed changes are technically feasible and economically reasonable. Furthermore, as noted earlier, incorporating these additions and modifications to existing Illinois regulations is required by the CAA and USEPA; specifically, Section 182(b)(2)(A) of the CAA requires that Illinois revise its SIP to include RACT for VOM emissions sources that are covered by a Group II CTG.

The Illinois EPA engaged in multiple rounds of outreach efforts in relation to this proposed rulemaking. The first was accomplished electronically, with the second involving follow-up calls from the Agency to sources that had submitted comments as well as extensive, detailed discussions between the Agency and industry group representatives. Such communication resulted in the Agency making numerous changes to the proposed rule between the original draft sent out for comments and the final proposal submitted to the Board, with almost all such changes being in response to industry concerns. In addition, the Agency has had frequent discussions with USEPA personnel in both the regional office and headquarters, and has gathered information from other states. Even after the Agency submitted its proposal to the Board, communication with these parties continued, resulting in the Motion to Amend Rulemaking Proposal that is being submitted along with this prefiled testimony. In responding to

industry, the Agency has been as agreeable as possible to recommendations while still adhering to USEPA requirements and maintaining the integrity of the rules.

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MOTION TO AMEND RULEMAKING PROPOSAL

The Proponent, the Illinois Environmental Protection Agency ("Illinois EPA"), by its attorney, and pursuant to 35 Ill. Adm. Code 101.500 and 102.402, moves that the Illinois Pollution Control Board ("Board") amend Parts 218 and 219 of this rulemaking proposal. In support of its Motion, the Illinois EPA states as follows:

1. On July 9, 2009, the Illinois EPA filed a proposal with the Board to amend 35 Ill. Adm. Code Parts 211, 218, and 219 to control the emissions of volatile organic materials ("VOM") from Group II Consumer and Commercial Product categories. The proposal implements reasonably available control technology for such categories in response to control techniques guidelines issued by the United States Environmental Protection Agency ("USEPA"). The Illinois EPA proposes the following amendments to its proposal.

Industrial Cleaning Solvents

2. The USEPA recently informed the Illinois EPA that the Illinois EPA may exempt digital printing from the control requirements set forth in Section 218/219.187 of its proposal. The Illinois EPA therefore recommends amending Section 218/219.187(a) by adding digital printing to the list of exclusions, and Section 218/219.187(b) by removing digital printing from the VOM content limitations.

Section 218/219.187(a)(2)(C)(xv) and (xvi):

C) The following cleaning operations shall be exempt from the requirements of subsections (b), (c), (f), and (g) of this Section:

.....

xv) Cleaning of numismatic dies;~~.~~

(xvi) Cleaning operations associated with digital printing.

Section 218/219.187(b)(1)(C)(ii) and (iii):

C) Cleaning of ink application equipment:

.....

ii)	Screen printing~~ and digital printing~~	0.50	4.2
iii)	Ultraviolet ink and electron beam ink application equipment, except screen printing~~ and digital printing~~	0.65	5.4

3. In response to a comment by industry representatives, the Illinois EPA proposes amending Section 218/219.187(e)(1)(B) by removing the requirement that a source include in its notification to the Illinois EPA calculations showing an exceedance of the applicability threshold.

Section 218/219.187(e)(1)(B):

B) Notify the Agency of any record that shows that the combined emissions of VOM from cleaning operations at the source ever equal or exceed 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment, within 30 days after the event occurs;~~. Such notification shall include calculations showing the daily emissions of VOM from cleaning operations at the source for the day(s) in which emissions equaled or exceeded 6.8 kg/day (15 lbs/day);~~

4. In response to a request by industry representatives, the Illinois EPA proposes amending Section 218/219.187(e)(2) by deleting the requirement that a subject source certify the limitation with which each subject cleaning operation will comply. The Illinois EPA also proposes

deleting the requirement that a source notify the Illinois EPA at least 30 days in advance of changing its method of compliance between the VOM content limitation and vapor pressure limitation.

Section 218/219.187(e)(2)(A)(iii):

A) By April 1, 2011, or upon initial start-up of the source, whichever is later, submit a certification to the Agency that includes:

.....

iii) ~~The limitation with which each subject cleaning operation will comply (i.e., the emissions control system requirement, VOM content limitation, or vapor pressure limitation), and if~~If complying with the emissions control system requirement, what type of emissions control system will be used;

Section 218/219.187(e)(2)(B):

B) At least 30 calendar days before changing the method of compliance between subsections (b)(1) or~~,~~ (b)(2)~~,~~ and subsection (b)(3) of this Section, notify the Agency in writing of such change. Such notification shall include a demonstration of compliance with the newly applicable subsection;

5. The Illinois EPA proposes amending Section 218/219.187(g) by clarifying when testing pursuant to such Section shall be performed.

Section 218.187(g)(1) and (2):

g) Testing Requirements.

1) Testing to demonstrate compliance with the requirements of this Section shall be conducted by the owner or operator within 90 days after a request by the Agency, or as otherwise specified in this Section. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Agency in writing 30 days in advance of conducting such testing to allow the Agency to be present during such testing;

2) Testing to demonstrate compliance with the VOM content limitations in Section 218.187(b)(1) of this Subpart, and to determine the VOM content of cleaning solvents and cleaning

solutions, shall be conducted ~~upon request of the Agency,~~ as follows:

Section 219.187(g)(1) and (2):

g) Testing Requirements.

1) Testing to demonstrate compliance with the requirements of this Section shall be conducted by the owner or operator within 90 days after a request by the Agency, or as otherwise specified in this Section. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Agency in writing 30 days in advance of conducting such testing to allow the Agency to be present during such testing;

2) Testing to demonstrate compliance with the VOM content limitations in Section 219.187(b)(1) of this Subpart, and to determine the VOM content of cleaning solvents and cleaning solutions, shall be conducted ~~upon request of the Agency,~~ as follows:

Flexible Packaging Printing

6. In response to a request by industry representatives, the Illinois EPA proposes amending Section 218/219.404(b)(1)(B) and (d)(1)(D) by deleting references to instruments by which owner or operators may calculate the volume or weight of coatings and inks as applied each day on subject coating lines, as such instrumentation is not currently available to sources.

Section 218/219.404(b)(1)(B):

B) Calculations which demonstrate that total maximum theoretical emissions of VOM from all flexographic and rotogravure printing lines at the source never exceed 90.7 Mg (100 tons) per calendar year before the application of capture systems and control devices. Total maximum theoretical emissions of VOM for a flexographic or rotogravure printing source is the sum of maximum theoretical emissions of VOM from each flexographic and rotogravure printing line at the source. The following equation shall be used to calculate total maximum theoretical emissions of VOM per calendar year before the application of capture systems and control devices for each flexographic and rotogravure printing line at the source:

$E_p = A \times B + 1095 (C \times D \times F)$

where:

E_p = Total maximum theoretical emissions of VOM from one flexographic or rotogravure printing line in units of kg/year (lbs/year);

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

B = Total volume of solids for all coatings and inks that can potentially be applied each year on the printing line in units of l/year (gal/year). The ~~instrument and/or~~ method by which the owner or operator accurately ~~measured or~~ calculated the volume of each coating and 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 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 (lbs VOM/gal) of such material;

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

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

Section 218/219.404(d)(1)(D):

D) The ~~instrument or~~ method by which the owner or operator will accurately ~~measure or~~ calculate the volume, or weight of solids, as applicable, of each coating and ink as applied each day on each printing line.

7. In response to a comment by industry representatives, the Illinois EPA recommends amending Section 218/219.404(f)(2) by removing the requirement that a source include in its notification to the Illinois EPA calculations showing an exceedance of the applicability threshold.

Section 218/219.404(f)(2):

2) Notify the Agency in writing if the combined emissions of VOM from all flexographic and rotogravure printing lines (including inks and solvents

used for cleanup operations associated with the flexographic and rotogravure lines) at the source ever equal or exceed 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment, within 30 days after the event occurs. ~~Such notification shall include calculations showing the daily emissions of VOM from all flexographic and rotogravure printing lines at the source for the day(s) in which emissions equaled or exceeded 6.8 kg/day (15 lbs/day).~~

Lithographic Printing

8. The Illinois EPA proposes amending Section 218/219.405(c) by deleting references to Section 218/219.408 that were inadvertently left in the rule, as the Illinois EPA is proposing to repeal Section 218/219.408.

Section 218.405(c):

c) On and after May 1, 2010:

1) The requirements in Sections 218.407(a)(1)(B) through (a)(1)(E) and 218.407(b) and all applicable provisions in Sections 218.40~~9~~8 through 218.411 of this Subpart shall apply to all owners or operators of heatset web offset lithographic printing line(s), if the combined emissions of VOM from all lithographic printing line(s) at the source (including solvents used for cleanup operations associated with the lithographic printing line(s)) ever exceed 45.5 kg/day (100 lbs/day), calculated in accordance with Section 218.411(b)(2)(B), before the application of capture systems and control devices;

2) The requirements in Sections 218.407(a)(1)(A) and 218.407(a)(2) through (a)(5) and all applicable provisions in Sections 218.40~~9~~8 through 218.411 of this Subpart shall apply to all owners or operators of lithographic printing line(s) if the combined emissions of VOM from all lithographic printing line(s) at the source (including solvents used for cleanup operations associated with the lithographic printing line(s)) ever equal or exceed 6.8 kg/day (15 lbs/day), calculated in accordance with Section 218.411(b)(1)(B), before the application of capture systems and control devices;

Section 219.405(c):

c) On and after May 1, 2010:

1) The requirements in Sections 219.407(a)(1)(B) through (a)(1)(E) and 219.407(b) and all applicable provisions in Sections 219.4098 through 219.411 of this Subpart shall apply to all owners or operators of heatset web offset lithographic printing line(s), if the combined emissions of VOM from all lithographic printing line(s) at the source (including solvents used for cleanup operations associated with the lithographic printing line(s)) ever exceed 45.5 kg/day (100 lbs/day), calculated in accordance with Section 219.411(b)(2)(B), before the application of capture systems and control devices;

2) The requirements in Sections 219.407(a)(1)(A) and 219.407(a)(2) through (a)(5) and all applicable provisions in Sections 219.4098 through 219.411 of this Subpart shall apply to all owners or operators of lithographic printing line(s) if the combined emissions of VOM from all lithographic printing line(s) at the source (including solvents used for cleanup operations associated with the lithographic printing line(s)) ever equal or exceed 6.8 kg/day (15 lbs/day), calculated in accordance with Section 219.411(b)(1)(B), before the application of capture systems and control devices;

9. The Illinois EPA proposes amending Section 218/219.409(a) and (c) by clarifying when testing pursuant to such Section shall be performed. The Illinois EPA also proposes amending subsection (c) by correcting an internal cross-reference.

Section 218.409(a) and (c):

a) Testing to demonstrate compliance with the requirements of Section 218.407 of this Subpart shall be conducted by the owner or operator within 90 days after a request by the Agency, or as otherwise specified in this Subpart. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Agency in writing 30 days in advance of conducting such testing to allow the Agency to be present during such testing.

.....

c) Testing to demonstrate compliance with the VOM content limitations in Section 218.407(a)(1)(A), (a)(2), (a)(3) and (a)(4)(A) of this Subpart, and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of Section 218.411(a)(1)(B), (b)(1)(B), or (b)(2)(B) of this Subpart, as applicable), shall be conducted upon request of the Agency, or as otherwise specified in this Subpart, as follows:

Section 219.409(a) and (c):

a) Testing to demonstrate compliance with the requirements of Section 219.407 of this Subpart shall be conducted by the owner or operator within 90 days after a request by the Agency, or as otherwise specified in this Subpart. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Agency in writing 30 days in advance of conducting such testing to allow the Agency to be present during such testing.

.....

c) Testing to demonstrate compliance with the VOM content limitations in Section 219.407(a)(1)(A), (a)(2), (a)(3) and (a)(4)(A) of this Subpart, and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of Section 219.411(a)(1)(B), (b)(1)(B), or (b)(2)(B) of this Subpart, as applicable), shall be conducted upon request of the Agency, or as otherwise specified in this Subpart, as follows:

10. The Illinois EPA proposes adding, and amending, Section 218/219.410 to the rulemaking proposal. In response to a comment from industry representatives, the Illinois EPA has discovered several incorrect internal cross-references within the current Section 218/219.410. The Illinois EPA therefore proposes amending subsections (b)(1), (b)(2), (e)(1)(B), and (e)(2) to correct the cross-references. As 218/219.410 is an existing section, only the Illinois EPA's proposed amendments are underlined below.

Section 218.410 Monitoring Requirements for Lithographic Printing

a) Fountain Solution Temperature.

1) The owner or operator of any lithographic printing line(s) relying on the temperature of the fountain solution to demonstrate compliance shall install, maintain, and continuously operate a temperature monitor of the fountain solution in the reservoir or fountain tray, as applicable.

2) The temperature monitor must be capable of reading with an accuracy of 1°C or 2°C, and must be attached to an automatic, continuous recording device such as a strip chart, recorder, or computer, with at least the same accuracy, that is installed, calibrated and maintained in accordance with

the manufacturer's specifications. If the automatic, continuous recording device malfunctions, the owner or operator shall record the temperature of the fountain solution at least once every two operating hours. The automatic, continuous recording device shall be repaired or replaced as soon as practicable.

b) Fountain Solution VOM Content. The owner or operator of any lithographic printing line(s) subject to Section 218.407(a)(1)(A), (a)(2) or (a)(3) of this Subpart shall:

1) For a fountain solution to which VOM is not added automatically:

A) Maintain records of the VOM content of the fountain solution in accordance with Section 218.411(ee)(2)(C); or

B) Take a sample of the as-applied fountain solution from the fountain tray or reservoir, as applicable, each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution in the fountain tray or reservoir, and shall determine compliance with the VOM content limitation of the as-applied fountain solution by using one of the following options:

i) With a refractometer or hydrometer with a visual, analog, or digital readout and with an accuracy of 0.5 percent. The refractometer or hydrometer must be calibrated with a standard solution for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications, against measurements performed to determine compliance. The refractometer or hydrometer must be corrected for temperature at least once per 8-hour shift or once per batch of fountain solution prepared or modified, whichever is longer; or

ii) With a conductivity meter if it is demonstrated that a refractometer and hydrometer cannot distinguish between compliant and noncompliant fountain solution for the type and amount of VOM in the fountain solution. A source may use a conductivity meter if it demonstrates that both hydrometers and refractometers fail to provide significantly different measurements for standard solutions containing 95 percent, 100 percent and 105 percent of the applicable VOM content limit. The conductivity meter reading for the fountain solution must be referenced to the conductivity of the incoming water. A standard solution shall be used to calibrate the conductivity meter for the type of VOM used

in the fountain solution, in accordance with manufacturer's specifications;

2) For fountain solutions to which VOM is added at the source with automatic feed equipment, determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level. Records must be retained of the VOM content of the fountain solution in accordance with Section 218.411(ee)(2)(D) of this Subpart. The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications.

c) Afterburners For Heatset Web Offset Lithographic Printing Line(s).

If an afterburner is used to demonstrate compliance, the owner or operator of a heatset web offset lithographic printing line subject to Section 218.407(a)(1)(C) of this Subpart shall:

1) Install, calibrate, maintain, and operate temperature monitoring device(s) with an accuracy of 3° C or 5° F on the afterburner in accordance with Section 218.105(d)(2) of this Part and in accordance with the manufacturer's specifications. Monitoring shall be performed at all times when the afterburner is operating; and

2) Install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device(s), such as a strip chart, recorder or computer, with at least the same accuracy as the temperature monitor.

d) Other Control Devices for Heatset Web Offset Lithographic Printing Line(s). If a control device other than an afterburner is used to demonstrate compliance, the owner or operator of a heatset web offset lithographic printing line subject to this Subpart shall install, maintain, calibrate and operate such monitoring equipment as set forth in the owner or operator's plan approved by the Agency and USEPA pursuant to Section 218.407(b) of this Subpart.

e) Cleaning Solution.

1) The owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with Section 218.407(a)(4)(A) of this Subpart must:

A) For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):

i) Install, operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed; and

ii) Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with Section 218.407(a)(4)(A) of this Subpart;

B) For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) as set forth in Section 218.411(~~f~~d)(2) of this Subpart.

2) The owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with Section 218.407(a)(4)(B) of this Subpart must keep records for such cleaning solutions used on any such line(s) as set forth in Section 218.411(~~f~~d)(2)(C) of this Subpart.

(Source: Amended at __ Ill. Reg. _____, effective_____)

Section 219.410 Monitoring Requirements for Lithographic Printing

a) Fountain Solution Temperature.

1) The owner or operator of any lithographic printing line(s) relying on the temperature of the fountain solution to demonstrate compliance shall install, maintain, and continuously operate a temperature monitor of the fountain solution in the reservoir or fountain tray, as applicable.

2) The temperature monitor must be capable of reading with an accuracy of 1°C or 2°F and must be attached to an automatic, continuous recording device such as a strip chart, recorder, or computer, with at least the same accuracy, that is installed, calibrated and maintained in accordance with the manufacturer's specifications. If the automatic, continuous recording device malfunctions, the owner or operator shall record the temperature of the fountain solution at least once every two operating hours. The automatic, continuous recording device shall be repaired or replaced as soon as practicable.

b) Fountain Solution VOM Content. The owner or operator of any lithographic printing line(s) subject to Section 219.407(a)(1)(A), (a)(2) or (a)(3) of this Subpart shall:

1) For a fountain solution to which VOM is not added automatically:

A) Maintain records of the VOM content of the fountain solution in accordance with Section 219.411(ee)(2)(C); or

B) Take a sample of the as-applied fountain solution from the fountain tray or reservoir, as applicable, each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution in the fountain tray or reservoir, and shall determine compliance with the VOM content limitation of the as-applied fountain solution by using one of the following options:

i) With a refractometer or hydrometer with a visual, analog, or digital readout and with an accuracy of 0.5 percent. The refractometer or hydrometer must be calibrated with a standard solution for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications, against measurements performed to determine compliance. The refractometer or hydrometer must be corrected for temperature at least once per 8-hour shift or once per batch of fountain solution prepared or modified, whichever is longer; or

ii) With a conductivity meter if it is demonstrated that a refractometer and hydrometer cannot distinguish between compliant and noncompliant fountain solution for the type and amount of VOM in the fountain solution. A source may use a conductivity meter if it demonstrates that both hydrometers and refractometers fail to provide significantly different measurements for standard solutions containing 95 percent, 100 percent and 105 percent of the applicable VOM content limit. The conductivity meter reading for the fountain solution must be referenced to the conductivity of the incoming water. A standard solution shall be used to calibrate the conductivity meter for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications;

2) For fountain solutions to which VOM is added at the source with automatic feed equipment, determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level. Records must be retained of the VOM content of the fountain solution in accordance with Section 219.411(ee)(2)(D) of this Subpart. The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications.

c) Afterburners For Heatset Web Offset Lithographic Printing Line(s).

If an afterburner is used to demonstrate compliance, the owner or operator of a heatset web offset lithographic printing line subject to Section 219.407(a)(1)(C) of this Subpart shall:

1) Install, calibrate, maintain, and operate temperature monitoring device(s) with an accuracy of 3°C or 5°F on the afterburner in accordance with Section 219.105(d)(2) of this Part and in accordance with the manufacturer's specifications. Monitoring shall be performed at all times when the afterburner is operating; and

2) Install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device(s), such as a strip chart, recorder or computer, with at least the same accuracy as the temperature monitor.

d) Other Control Devices for Heatset Web Offset Lithographic Printing Line(s). If a control device other than an afterburner is used to demonstrate compliance, the owner or operator of a heatset web offset lithographic printing line subject to this Subpart shall install, maintain, calibrate and operate such monitoring equipment as set forth in the owner or operator's plan approved by the Agency and USEPA pursuant to Section 219.407(b) of this Subpart.

e) Cleaning Solution.

1) The owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with Section 219.407(a)(4)(A) of this Subpart must:

A) For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):

i) Install, operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed; and

ii) Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with Section 219.407(a)(4)(A) of this Subpart;

B) For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) as set forth in Section 219.411(~~f~~f)(2) of this Subpart.

2) The owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with Section 219.407(a)(4)(B) of this Subpart must keep records for such cleaning solutions used on any such line(s) as set forth in Section 219.411(~~f~~f)(2)(C) of this Subpart.

(Source: Amended at __ Ill. Reg. _____, effective_____)

11. The Illinois EPA recommends amending Section 218/219.411(a)(1)(C) by deleting references to instruments by which owners or operators may calculate the volume of inks as applied each day on subject printing lines, as such instrumentation is not currently available to sources.

Section 218/219.411(a)(1)(C):

C) Either a declaration that the source, through federally enforceable permit conditions, has limited its maximum theoretical emissions of VOM from all heatset web offset lithographic printing lines (including solvents used for cleanup operations associated with heatset web offset printing lines) at the source to no more than 90.7 Mg (100 tons) per calendar year before the application of capture systems and control devices or calculations which demonstrate that the source's total maximum theoretical emissions of VOM do not exceed 90.7 Mg/yr (100 TPY). 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:

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

Where:

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;

12. The Illinois EPA proposes amending Section 218/219.411(b) by changing the material use thresholds for lithographic printing lines. USEPA previously recommended that material use thresholds for such lines be conservatively based on 50 percent of the pound per day applicability threshold. USEPA has now determined that a 90 percent emission equivalency level is acceptable for both lithographic and letterpress printing operations. The following amendments reflect the 90 percent equivalency level for lithographic printing lines.

Section 218/219.411(b)(1)(C)(i) and (b)(1)(C)(ii):

C) As an alternative to the calculations in subsection (b)(1)(B), above, a statement that the source uses less than the amount of material specified in subsections (b)(1)(C)(i) or (ii), below, as applicable, during each calendar month. A source may determine that it emits below 6.8 kg/day (15 lbs/day) of VOM based upon compliance with such material use limitations. If the source exceeds this amount of material use in a given calendar month, the owner or operator must, within 15 days of the end of that month, complete the emissions calculations of subsection (b)(1)(B) to determine daily emissions for applicability purposes. If the source ever

exceeds this amount of material use for six consecutive calendar months, it is no longer eligible to use this subsection as an alternative to the calculations in subsection (b)(1)(B). If a source has both heatset web offset and either nonheatset web offset or sheetfed lithographic printing operations, or has all three types of printing operations, the owner or operator may not make use of this alternative and must use the calculations in subsection (b)(1)(B).

i) The sum of all sheetfed and nonheatset web offset lithographic printing operations at the source: 242.3~~132.5~~ liters (64~~35~~ gallons) of cleaning solvent and fountain solution additives, combined; or

ii) The sum of all heatset web offset lithographic printing operations at the source: 204.1~~113.4~~ kg (450~~250~~ lbs) of ink, cleaning solvent, and fountain solution additives, combined.

13. In response to a comment by industry representatives, the Illinois EPA proposes amending Section 218/219.411(b)(1)(E) by removing the requirement that a source include in its notification to the Illinois EPA calculations showing an exceedance of the applicability threshold.

Section 218.411(b)(1)(E):

E) For sources complying with subsection (b)(1)(B) of this Section, notify the Agency in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source ever equal or exceed 6.8 kg/day (15 lbs/day), before the use of capture systems and control devices, within 30 days after the event occurs. ~~Such notification shall include calculations pursuant to Section 218.411(b)(1)(B) showing the daily emissions of VOM from all lithographic printing lines at the source for the month in which emissions equaled or exceeded 6.8 kg/day (15 lbs/day).~~ If such emissions of VOM at the source equal or exceed 6.8 kg/day (15 lbs/day) but do not exceed 45.5 kg/day (100 lbs/day), the source shall comply with the requirements in subsection (b)(2) of this Section.

Section 219.411(b)(1)(E):

E) For sources complying with subsection (b)(1)(B) of this Section, notify the Agency in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines)

at the source ever equal or exceed 6.8 kg/day (15 lbs/day), before the use of capture systems and control devices, within 30 days after the event occurs. ~~Such notification shall include calculations pursuant to Section 219.411(b)(1)(B) showing the daily emissions of VOM from all lithographic printing lines at the source for the month in which emissions equaled or exceeded 6.8 kg/day (15 lbs/day).~~ If such emissions of VOM at the source equal or exceed 6.8 kg/day (15 lbs/day) but do not exceed 45.5 kg/day (100 lbs/day), the source shall comply with the requirements in subsection (b)(2) of this Section.

14. In response to a comment by industry representatives, the Illinois EPA proposes amending Section 218/219.411(b)(2)(D) by removing the requirement that a source include in its notification to the Illinois EPA calculations showing an exceedance of the applicability threshold.

Section 218.411(b)(2)(D):

D) Notify the Agency in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source ever exceed 45.5 kg/day (100 lbs/day), before the use of capture systems and control devices, within 30 days after the event occurs. ~~Such notification shall include calculations pursuant to Section 218.411(b)(2)(B) showing the daily emissions of VOM from all lithographic printing lines at the source for the month in which emissions exceeded 45.5 kg/day (100 lbs/day).~~

Section 219.411(b)(2)(D):

D) Notify the Agency in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source ever exceed 45.5 kg/day (100 lbs/day), before the use of capture systems and control devices, within 30 days after the event occurs. ~~Such notification shall include calculations pursuant to Section 219.411(b)(2)(B) showing the daily emissions of VOM from all lithographic printing lines at the source for the month in which emissions exceeded 45.5 kg/day (100 lbs/day).~~

15. In response to a request by industry representatives, the Illinois EPA proposes amending Section 218/219.411(f)(2)(B) and (f)(2)(C) by specifying that, for cleaning solutions used as-

purchased, sources may use manufacturer's specifications to determine VOM content and VOM composite partial vapor pressure.

Section 218.411(f)(2)(B)(v), (f)(2)(C)(iii), and (f)(2)(C)(v):

B) For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with Section 218.407(a)(4)(A) of this Subpart, and which is not prepared at the source with automatic equipment:

.....

v) The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in Section 218.105(a) of this Part;

C) For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with Section 218.407(a)(4)(B) of this Subpart:

.....

iii) The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with Section 218.409(e) of this Subpart. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in Sections 218.105(a) and 218.110 of this Part;

iv) The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and

v) The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with Section 218.409(e) of this Subpart. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in Sections 218.105(a) and 218.110 of this Part;

Section 219.411(f)(2)(B)(v), (f)(2)(C)(iii), and (f)(2)(C)(v):

B) For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with Section 219.407(a)(4)(A) of this Subpart, and which is not prepared at the source with automatic equipment:

.....

v) The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in Section 219.105(a) of this Part;

C) For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with Section 219.407(a)(4)(B) of this Subpart:

.....

iii) The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with Section 219.409(e) of this Subpart. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in Sections 219.105(a) and 219.110 of this Part;

iv) The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and

v) The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with Section 219.409(e) of this Subpart. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in Sections 219.105(a) and 219.110 of this Part;

16. In response to a request by industry representatives, the Illinois EPA proposes amending Section 218/219.411(g)(2)(A) to correct a grammar mistake.

Section 218/219.411(g)(2)(A)(ii):

ii) The amount of cleaning materials used on lithographic printing lines at the source that does not comply with the cleaning material limitations in Section 218.407(a)(4) of this Subpart.

17. In response to a comment by industry representatives, the Illinois EPA proposes amending Section 218/219.411(g)(2)(B) by removing the requirement that a source include in its notification to the Illinois EPA calculations showing an exceedance of the applicability threshold.

Section 218.411(g)(2)(B):

B) Notify the Agency in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source ever exceed 45.5 kg/day (100 lbs/day), before the use of capture systems and control devices, within 30 days after the event occurs. ~~Such notification shall include calculations pursuant to Section 218.411(b)(2)(B) showing the daily emissions of VOM from all lithographic printing lines at the source for the month in which emissions exceeded 45.5 kg/day (100 lbs/day).~~

Section 219.411(g)(2)(B):

B) Notify the Agency in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source ever exceed 45.5 kg/day (100 lbs/day), before the use of capture systems and control devices, within 30 days after the event occurs. ~~Such notification shall include calculations pursuant to Section 219.411(b)(2)(B) showing the daily emissions of VOM from all lithographic printing lines at the source for the month in which emissions exceeded 45.5 kg/day (100 lbs/day).~~

Letterpress Printing:

18. In response to a request by industry representatives, the Illinois EPA proposes amending Section 218/219.415(a) and (c) by clarifying when testing pursuant to such Section shall be performed.

Section 218.415(a) and (c):

a) Testing to demonstrate compliance with the requirements of Section 218.413 of this Subpart shall be conducted by the owner or operator within 90 days after a request by the Agency, or as otherwise specified in this Subpart. Such testing shall be conducted at the expense of the owner or operator, and the owner or operator shall notify the Agency in writing 30 days in advance of conducting such testing to allow the Agency to be present during such testing.

.....

c) Testing to demonstrate compliance with the VOM content limitations in Section 218.413(a)(2)(A) of this Subpart, and to determine the VOM content of cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of Section 218.417(b)(1)(B) of this Subpart), shall be conducted upon request of the Agency, or as otherwise specified in this Subpart, as follows:

Section 219.415(a) and (c):

a) Testing to demonstrate compliance with the requirements of Section 219.413 of this Subpart shall be conducted by the owner or operator within 90 days after a request by the Agency, or as otherwise specified in this Subpart. Such testing shall be conducted at the expense of the owner or operator, and the owner or operator shall notify the Agency in writing 30 days in advance of conducting such testing to allow the Agency to be present during such testing.

.....

c) Testing to demonstrate compliance with the VOM content limitations in Section 219.413(a)(2)(A) of this Subpart, and to determine the VOM content of cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of Section 219.417(b)(1)(B) of this Subpart), shall be conducted upon request of the Agency, or as otherwise specified in this Subpart, as follows:

19. The Illinois EPA proposes amending Section 218/219.417(b)(1) by changing the material use thresholds for letterpress printing lines. USEPA previously recommended that material use thresholds for lithographic printing lines be conservatively based on 50 percent of the pound per day applicability threshold. USEPA has now determined that a 90 percent emission equivalency level is acceptable for both lithographic and letterpress printing operations. The following amendments reflect the 90 percent equivalency level for letterpress printing lines.

Section 218/219.417(b)(1)(D)(i) and (b)(1)(D)(ii):

D) As an alternative to the calculations in subsection (b)(1)(B), above, a statement that the source uses less than the amount of material specified in subsections (b)(1)(D)(i) or (b)(1)(D)(ii), below, as applicable, during each calendar month. A source may determine that it emits below 6.8 kg/day (15 lbs/day) of VOM based upon compliance with such material use limitations. If the source exceeds this amount of material use in a given calendar month, the owner or operator must, within 15 days of the end of that month, complete the emissions calculations of subsection (b)(1)(B) to determine daily emissions for applicability purposes. If the source ever exceeds this amount of material use for six consecutive calendar months, it is no longer eligible to use this subsection as an alternative to the calculations in subsection (b)(1)(B). If a source has both heatset web and either nonheatset web or sheetfed letterpress printing operations, or has all three types of printing operations, the owner or operator may not make use of this alternative and must use the calculations in subsection (b)(1)(B).

i) The sum of all sheetfed and nonheatset web letterpress printing operations at the source: 242.3~~132.5~~ liters (64~~35~~ gallons) of cleaning solvent; or

ii) The sum of all heatset web letterpress printing operations at the source: 204.1~~113.4~~ kg (450~~250~~ lbs) of ink and cleaning solvent.

20. In response to a comment by industry representatives, the Illinois EPA proposes amending Section 218/219.417(b)(2) by removing the requirement that a source include in its notification to the Illinois EPA calculations showing an exceedance of the applicability threshold.

Section 218.417(b)(2):

2) For sources complying with subsection (b)(1)(B) of this Section, notify the Agency in writing if the combined emissions of VOM from all letterpress printing lines (including inks and solvents used for cleanup operations associated with the letterpress printing lines) at the source ever equal or exceed 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment, within 30 days after the event occurs. ~~Such notification shall include calculations pursuant to Section 218.417(b)(1)(B) showing the daily emissions of VOM from all letterpress printing lines at the source for the month in which emissions equaled or exceeded 6.8 kg/day (15 lbs/day).~~

Section 219.417(b)(2):

2) For sources complying with subsection (b)(1)(B) of this Section, notify the Agency in writing if the combined emissions of VOM from all letterpress printing lines (including inks and solvents used for cleanup operations associated with the letterpress printing lines) at the source ever equal or exceed 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment, within 30 days after the event occurs. ~~Such notification shall include calculations pursuant to Section 219.417(b)(1)(B) showing the daily emissions of VOM from all letterpress printing lines at the source for the month in which emissions equaled or exceeded 6.8 kg/day (15 lbs/day).~~

21. In response to a comment by industry representatives, the Illinois EPA proposes amending Section 218/219.417(e)(2)(B) and (e)(2)(C) by specifying that, for cleaning solutions used as-purchased, sources may use manufacturer's specifications to determine VOM content and VOM composite partial vapor pressure.

Section 218.417(e)(2)(B)(v), (e)(2)(C)(iii), and (e)(2)(C)(v):

B) For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with Section 218.413(a)(2)(A) of this Subpart, and which is not prepared at the source with automatic equipment:

.....

v) The VOM content of the as-used cleaning solution, with supporting calculations. <u>For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results</u>

of tests of the VOM content conducted in accordance with methods specified in Section 218.105(a) of this Part;

C) For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with Section 218.413(a)(2)(B) of this Subpart:

.....

iii) The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with Section 218.415(e) of this Subpart. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in Sections 218.105(a) and 218.110 of this Part;

iv) The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and

v) The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with Section 218.415(e) of this Subpart. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in Sections 218.105(a) and 218.110 of this Part;

Section 219.417(e)(2)(B)(v), (e)(2)(C)(iii), and (e)(2)(C)(v):

B) For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with Section 219.413(a)(2)(A) of this Subpart, and which is not prepared at the source with automatic equipment:

.....

v) The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in Section 219.105(a) of this Part;

C) For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with Section 219.413(a)(2)(B) of this Subpart:

.....

iii) The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with Section 219.415(e) of this Subpart. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in Sections 219.105(a) and 219.110 of this Part;

iv) The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and

v) The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with Section 219.415(e) of this Subpart. For cleaning solutions that are used as purchased, the manufacturer's specifications for VOM composite partial vapor pressure may be used if such manufacturer's specifications are based on results of tests conducted in accordance with methods specified in Sections 219.105(a) and 219.110 of this Part;

WHEREFORE, for the reasons set forth above, the Illinois EPA moves that the Board amend Parts 218 and 219 as set forth herein.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: Dana Vetterhoffer

Dana Vetterhoffer
Assistant Counsel
Division of Legal Counsel

DATED: September 14, 2009

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
REASONABLY AVAILABLE CONTROL	)	R10-8
TECHNOLOGY (RACT) FOR VOLATILE	)	(Rulemaking-Air)
ORGANIC MATERIAL EMISSIONS FROM	)	
GROUP II CONSUMER & COMMERCIAL	)	
PRODUCTS: PROPOSED AMENDMENTS	)	
TO 35 ILL. ADM. CODE 211, 218, and 219	)	

CERTIFICATE OF SERVICE

I, the undersigned, an attorney, state that I have served electronically the attached TESTIMONTY OF DAVID BLOOMBERG and MOTION TO AMEND RULEMAKING PROPOSAL upon the following person:

John Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601-3218

and electronically to the following persons:

SEE ATTACHED SERVICE LIST.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: Dana Vetterhoffer
Dana Vetterhoffer
Assistant Counsel
Division of Legal Counsel

DATED: September 14, 2009

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