



**Printing Industry of  
Illinois/Indiana Association**

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April 15, 2011

Clerk's Office  
Illinois Pollution Control Board  
James R. Thompson Center, Suite 11-500  
100 W. Randolph St.  
Chicago, IL 60601

RE: Docket R11-23 Proposed Amendments to 35 Illinois Administrative Code 211, 218, and 219

To Whom It May Concern:

On behalf of the affected members of Illinois' graphic arts community, the Printing Industry of Illinois/Indiana Association (PII) and the Specialty Graphic Imaging Association (SGIA) thank you for the opportunity to review and comment on the proposed amendments to 35 Ill. Adm. Code 211, 218, and 219. Both PII and SGIA appreciate the Illinois Environmental Protection Agency's (IEPA) willingness to work with the printing industry in developing these amendments regarding the application of reasonably available control technology (RACT). In reviewing the proposed amendments to 35 IAC 211, 218, 219, PII is concerned about the impact that they will have on our members.

As background, PII represents the printing and publishing industry (SIC 2700 and various NAICS 323 codes) in Illinois and Indiana. As reported in the 2010 Print Market Atlas, the value of goods shipped for the industry in Illinois is approximately \$9.3 billion. Approximately 1,915 companies employing about 60,485 workers are engaged in offset lithographic printing in Illinois. PII represents 254 of these firms. Seventy-four percent of Illinois printers employ less than 20 employees. Printing is a prime example of small businesses involved in manufacturing.

Following are our comments and requested changes related to the Group II CTG Rules Revisions. Please contact Gary Jones, Printing Industries of America's Assistant Vice President of Environmental, Health, and Safety Affairs, at 412-259-1794 ([gjones@printing.org](mailto:gjones@printing.org)) or Marci Kinter, Vice President – Government and Business Information with the SGIA at 703-359-1313 ([marcik@sgia.org](mailto:marcik@sgia.org)) with any questions you may have regarding these comments.

We look forward to working with you toward the mutual benefit of the Bureau of Air and Illinois' graphic arts firms.

Sincerely,

A handwritten signature in black ink, appearing to read "Joanne Rock".

Joanne Rock  
President and CEO

A handwritten signature in black ink, appearing to read "Marcia Kinter".

Vice President – Government & Business Information  
Specialty Graphic Imaging Association

COMMENTS RE: Docket R11-23 Proposed Amendments to 35 Illinois Administrative Code 211, 218, and 219

PII and SGIA requests that IEPA consider the comments listed below as it moves forward with its rulemaking. PII and SGIA's suggested changes to the proposed language are shown with insertions *italicized and underlined* and deletions indicated with a ~~strikethrough~~. **Note that all comments and suggested changes to Section 218 apply as well to the corresponding requirements in Section 219.**

### **Subpart E: Solvent Cleaning**

#### **Section 218.187(a) Applicability**

1. The rule does not specifically address substrate cleaning for screen printing. Sections 218.187(a)(2)(A)(iv) and (a)(2)(C)(xvi) include exemptions for pre-press cleaning operations including activities associated with several types of printing, such as "film processors, color scanners, plate processors, film cleaning, and plate cleaning" and digital printing. However there are no exemptions for substrate cleaning for screen printing operations. Substrate cleaning is necessary to insure the ink will properly adhere to the surface of the substrate, which frequently has residue on the surface of the as-received that must be removed prior to printing. Although 218.187(b)(1)(A) does refer to "Product cleaning during manufacturing process or surface preparation for coating, adhesive, or ink application", the specific categories referenced are electrical and electronic components and pharmaceutical and medical devices - not screen printing substrates.

Therefore, we request that the following exemption be added to Section 218.187(a)(2)(A), as (a)(2)(A)(v):

#### **v) Cleaning of substrates prior to screen printing**

2. Section 218.187(a)(2)(C)(xiv) of this rule exempts cleaning of metering rollers, dampening rollers, and printing plates from sections (b), (c), (f), and (g) of this rule. As these cleaning operations take place at lithographic printing operations, they are already exempt from sections (b), (c), (f), and (g) as well as sections (d) and (e), since (a)(2)(B)(ii) exempts lithographic printing from sections (b) through (g). Therefore, section (a)(2)(C)(xiv) should be deleted to avoid confusion regarding the applicability of Sections 218.187(d) and (e) to cleaning of metering rollers, dampening rollers, and printing plates.
3. Section 218.187(a)(2)(C) of this rule exempts numerous cleaning operations from sections (b), (c), (f), and (g) of the rule, but not section (e). For sources identified in Section (a)(2)(C), the only applicable requirement in section (e), is (e)(2)(vii), which requires a description of each cleaning operation and listing of emission units exempt due to section (a)(2). As this information does not limit or reduce emissions in any way, it creates an unnecessary recordkeeping burden for exempt sources and requires both exempt sources and the department to dedicate time to a task that does not improve air quality.

Therefore, we request that Section 218.187(a)(2)(C) be revised as follows to indicate that the listed cleaning operations are completely exempt from Section 218.187(e):

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

As an alternative, Section 218.187(a)(2)(C) could be removed and combined with Section 218.187(a)(2)(B).

4. PII supports the IEPA in the inclusion of Section 218.187(e) as an exempt section for the sources listed in 218.187(a)(2)(A) and (B). As these operations are exempt from the remainder of the rule, there is no need for facilities to submit a notification to the IEPA of their exemption, as it would be an economic and administrative burden to both the IEPA and exempt facilities. PII thanks the IEPA for proposing this change. As noted above, PII believes the operations included in Section 218.187(a)(2)(C) should also be included in this exemption category.

#### Section 218.187(e) Recordkeeping and Reporting Requirements

The rule does not include a provision for retention of cleaning solvent in shop towels. The recordkeeping section of the lithographic rule, Section 218.411(b)(1)(B)(iv), provides for 50 percent retention of cleaning solutions used with shop towels kept in closed containers that have a vapor pressure of 10 mm Hg or less at 20°C (68°F). The same VOM retention factor should be included in this rule. While the 2006 Lithographic and Letterpress CTG recommended this retention factor, the basis for the retention factor is due to cleaning solutions having a vapor pressure below 10 mm Hg at 20°C (68°F), which is universally applicable to all cleaning solvents used with shop towels. The question of applicability of this retention factor for non-lithographic processes has been answered by the EPA in the June, 2007 Technical Support Document for Title V Permitting of Printing Facilities.

Page 60 of the 2007 TSD states:

“Yes, non-lithographic processes are eligible for use of a retention factor to estimate emissions from manual cleaning activities when using low vapor pressure cleaning solvents with shop towels, in accordance with the ACT document for lithographic printing (EPA, 1994). To estimate emissions from cleaning activities, consideration should be given not only to the quantities and VOC content of materials consumed, but also to other factors that characterize the fate of the VOC in the cleaning solvent. For example, for manual cleaning with low vapor pressure cleaning materials, it may be assumed when estimating emissions, that 50 percent of the VOC applied remains in the shop towel after use provided that the cleaning materials and used shop towels are kept in closed containers.”

Page 19 of the 2006 Lithographic and Letterpress CTG states:

#### “B. Retention of Low VOM Composite Vapor Pressure Cleaning Materials in Shop Towels

We recommend using a 50 percent VOM retention factor for low VOM composite vapor pressure cleaning materials in shop towels where (1) VOM composite vapor pressure of the cleaning material is less than 10 mm Hg at 20 °C, and (2) cleaning materials and used shop towels are kept in closed containers.”

For the above reasons, we request that a 50 percent retention factor for cleaning solvents with a vapor pressure of 10 mm Hg or less, used with shop towels kept in closed containers be added to Section 218.187(e)(10) as follows:

*10) All emission calculations required by this subsection (e) shall use an emission adjustment factor of 0.50 in calculating emissions from used shop towels if the VOM composite vapor pressure of each associated cleaning solution is less than 10 mmHg measured at 20°C (68°F) and the shop towels are kept in closed containers. For cleaning solutions with VOM composite vapor pressures of equal to or greater than 10 mmHg measured at 20°C (68°F) and for shop towels that are not kept in closed containers, no emission adjustment factor is used.*

#### **Subpart H: Printing and Publishing**

##### Section 218.409 Testing for Lithographic Printing

The proposed change made to the testing requirements for oxidizers used on heatset web offset presses requires oxidizers to be tested by January 1, 2012, unless they were tested since January 1, 2010. PII believes this requirement needs to be revised.

These requirements pose an undue administrative and economic testing burden on lithographic printing facilities for several reasons:

- Printers with heatset presses subject to the rule have already been required to obtain operating permits, and those permits only require stack testing at the time of installation or start-up of a control device. These permits do not establish periodic stack testing as a monitoring condition, instead rely on an oxidizer's operating temperature to gauge if the control device is operating within permitted emission control limits. Requiring additional testing in this scenario is not justified and represents a significant cost to printers.
- Stack testing for compliance demonstration purposes can cost between \$10,000 to \$15,000 and it is economically infeasible to conduct duplicate stack tests especially when temperature monitoring data indicates such tests are unnecessary.
- USEPA's *Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing*, the basis for this regulatory change, contains no such requirement. The Illinois EPA's proposal to require all facilities to perform stack testing goes far beyond USEPA's recommendation.

Section 218.409(a) needs to be revised to allow the results from the most recent stack test, if it was performed and approved using an acceptable testing protocol, to serve as the basis for demonstrating compliance with the proposed rule.

This recommendation is consistent with the USEPA's *Technical Support Document (TSD) for Title V Permitting of Printing Operations* ([www.epa.gov/ttn/oarpg/t5/memoranda/tsd.pdf](http://www.epa.gov/ttn/oarpg/t5/memoranda/tsd.pdf)), which states in *Table D-1 List of Monitoring Protocols* on page D-4:

Protocol	Type	Source	Key Parameters
1	Thermal oxidizer	Press, coater, laminator	<ol style="list-style-type: none"> <li>1. Combustion chamber temperature</li> <li>2. Inspections</li> <li>3. Performance testing once every 5 years</li> <li>4. Assessment of valve leaking (regenerative units only)</li> </ol>
2	Catalytic oxidizer	Press, coater, laminator	<ol style="list-style-type: none"> <li>1. Catalyst bed inlet temperature</li> <li>2. Annual assessment of catalyst activity</li> <li>3. Inspections</li> <li>4. Performance testing once every 5 years</li> <li>5. Assessment of valve leaking (regenerative units only)</li> </ol>

Also, since the effective date of compliance with the proposed rule for new presses is the installation date of the new press, the proposed rule needs to be revised to provide 180 days to demonstrate compliance with the rule's add-on control requirements. This additional time will afford owners and operators of new subject presses the time to fully gauge and establish the typical operating conditions referenced in proposed paragraph 218.409 (b)(5) under which the compliance testing should occur.

Therefore, we request the following changes to Section 218.409(a):

Testing to demonstrate compliance with the requirements of Section 218.407 of this Subpart shall be conducted by January 1, 2012, unless such prior testing has been

~~conducted within the two years immediately preceding January 1, 2012.~~ demonstrating compliance with the requirements of Section 218.407 has been conducted in accordance with an existing operating permit. Thereafter, testing shall be conducted by the owner or operator within ~~90~~ 180 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.

Section 218.411(b)(1)(F)

The change proposed to this section creates a record keeping burden that contradicts the purpose of allowing facilities to determine exemption based on material use thresholds. The material use system is based on maintaining records of the amount (weight / volume) of materials used and comparing with the thresholds established. However, requiring additional information, such as the name, identification number and VOM content of each cleaning solvent and fountain solution creates a significant recordkeeping burden while providing no additional benefit. If a facility exceeds the material use threshold and calculation are required to demonstrate exemption (per (b)(1)(C)), then this information is necessary for calculations, as outlined in (b)(1)(B). Including this additional information as required recordkeeping for facilities choosing to meet the requirements of (b)(1)(C)(i) or (b)(1)(C)(ii) is not necessary.

Therefore, we request the following changes to Section 218.411(b)(1)(F):

For sources complying with subsection (b)(1)(C) of this Section, comply with the following:

- i) Maintain material use records showing that the source uses less than the amount of material specified in subsections (b)(1)(C)(i) and (b)(1)(C)(ii) during each calendar month, or, if the source exceeds the material use limitations, records showing that the source exceeded the limitations but did not emit 6.8 kg/day (15 lbs/day) or more of VOM, and provide such records to the Agency upon request. On and after January 1, 2012, such records shall include ~~the name, identification number, and VOM content of each cleaning solvent and fountain solution additive used per calendar month,~~ the volume of each cleaning solvent and fountain solution additive used per calendar month for each sheetfed and nonheatset web offset lithographic printing operation, and the weight of each cleaning solvent, ink, and fountain solution additive used per calendar month for each heatset web offset lithographic printing operation;

-- End of comments --