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John Therriault
Clerk
Illinois Pollution Control Board
100 W. Randolph St., Ste. 11-500
Chicago, IL 60601

Attn: R10-8 Rulemaking – Air: Lithographic Printing Rules

PCII 1

To whom it may concern,

I wish to submit comments regarding the proposed changes to the Reasonably Available Control Technology (RACT) for Volatile Organic Material Emissions Standards drafted by the Illinois Pollution Control Board (IPCB) that incorporates United States Environmental Protection Agency (USEPA) Control Techniques Guideline (CTG) into Illinois regulations. I specifically wish to request clarification be added in the rule for control device destruction efficiencies.

I am an environmental consultant that represents a heatset offset lithographic printer who recently installed a replacement catalytic oxidizer on three (3) older heatset lithographic printing lines. (Note: older heatset presses did not have integrated afterburners as the new presses do.) The control device efficiency was permitted at 90% as allowed by current regulations. When USEPA finalized the Offset Lithographic Printing Materials and Letterpress Printing Materials CTG they allowed for existing printing lines with control devices to have minimum 90% destruction efficiency. Illinois has incorporated that language as follows:

218.407 (a)(1)(C) An afterburner is installed and operated so that VOM emissions (excluding methane and ethane) from the press dryer exhausts are reduced as follows:

i) Prior to May 1, 2010, by 90 percent, by weight, or to a maximum afterburner exhaust outlet concentration of 20 ppmv (as carbon); and

i) On and after May 1, 2010, by at least 95 percent, by weight, or to a maximum afterburner exhaust outlet concentration of 20 ppmv (as carbon)

We request that this language be a little clearer to show what is being addressed, the printing line, the afterburner, or both. Also we request that the language be clearer that it is the installation/operation date of the unit that determines what percent efficiency must

be achieved, and not that all control devices must perform at a higher destruction efficiency after May 1, 2010.

The following section also requires similar clarification that it is the date of installation of the control device that determines what control efficiency must be attained:

218.407 (b) An owner or operator of a heatset web offset lithographic printing line subject to the requirements of (a)(1)(C) of this Section may use a control device other than an afterburner, if:
1) The control device reduces VOM emissions from the press dryer exhaust(s) are reduced as follows:

A) Prior to May 1, 2010, by at least 90 percent, by weight, or to a maximum afterburner exhaust outlet concentration of 20 ppmv (as carbon); and

B) On and after May 1, 2010;
i) By at least 95 percent, by weight; or
ii) To a maximum control device exhaust outlet concentration of 20 ppmv (as carbon)

Current heatset lithographic presses are designed with an integrated drying oven / thermal oxidizer control. These units easily achieve the proposed 95% destruction rate and are cost effective when purchasing new heatset presses. Many existing older units, however, require stand alone control devices. They are not engineered for optimized (lower) dryer air flow rates. As control device operational costs (natural gas usage) are high for these older presses it is more cost effective to duct emissions to catalytic oxidizers for control. Catalyst efficiency may slightly reduce over time and we wish to ensure that it is clear in the rules that these units will always be able to comply with the 90% destruction minimum.

Please provide clarification whether it is the effective operation date of the printing line or the control device, or both in relation to the May 1, 2010 control efficiency requirement. Will existing printing lines installed and operated prior to May 1, 2010 that require a stand alone control device be allowed to install new control devices that meet the 90% minimum destruction efficiency? Or will the control device installation / operation date determine what destruction efficiency is required? (that the 95% minimum destruction efficiency is for printing units "installed and operated" after May 1, 2010).

If the control device installation/operation date is the determining factor, can it be made clear that all existing units maintain their status (90% destruction) through all equipment maintenance and repair, including replacement of catalyst? This could create a financial burden on sources to replace control devices that were compliant with the lithographic printing rules when the printing units were installed.

Please note that the bulk of heatset lithographic printing emissions come from cleanup solvents, not the inks. Cleanup solvents are not controlled by the oxidizer when hand applied with rags. The destruction efficiency will not affect these emissions, as they are limited by the solvent vapor pressure and work practices.

If you have any questions regarding this clarification request, please feel free to contact me at (630) 993-2138 or by e-mail at bmeerman@mostardiplattenv.com. Thank you for your consideration of our request.

Sincerely,

Bruce Meerman
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