217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Jefferson Smurfit Corporation
Attn: Al Saberniak, Plant Controller
1000 East Armstrong Street
Morris, Illinois 60450

Application No.: 95080132 I.D. No.: 063060AAE
Applicant's Designation: Date Received: August 31, 1995
Operation of: Folding Carton Manufacturing Plant
Date Issued: August 14, 2001 Expiration Date[2]: August 14, 2006
Source Location: 1000 East Armstrong Street, Morris, Grundy County
Responsible Official: Robert E. Lewis, General Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a folding carton manufacturing facility, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Sunil Suthar at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:SIS:psj

cc: Illinois EPA, FOS, Region 1

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

[2] Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Jefferson Smurfit Corporation
1000 East Armstrong Street
Morris, Illinois 60450
815 942-1520

I.D. No.: 063060AAE
Standard Industrial Classification: 2657, Folding Paperboard and Sanitary Boxes

1.2 Owner/Parent Company

Jefferson Smurfit Corporation
8182 Maryland Avenue
Clayton, Missouri 63105

1.3 Operator

Jefferson Smurfit Corporation
1000 East Armstrong Street
Morris, Illinois 60450

Al Saberniak, Plant Controller
815 942-1520

1.4 General Source Description

Jefferson Smurfit (U.S.) is located at 1000 East Armstrong Street in the City of Morris, Morris Township, Grundy County, Illinois. The source manufactures folding cartons from paperboard into containers to meet customer specifications and product end use requirements. The manufacturing process basically consists of sheeting or cutting rolled paperboard into sheets; printing; cutting/scoring printed or unprinted paperboard into individual carton blanks; finishing where the carton blanks are folded, glued and otherwise processed into packaging meeting customer specifications; and the preparation and packaging of the cartons for shipment. During these processes, scrap paperboard is collected, shredded and bailed for shipment and eventual recycling. In addition, the source has support operations which are basically include a plate room where offset lithographic printing plates are processed for use on the printing presses, a maintenance department, boilers for comfort heating, and storage handling.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

acfm	Actual cubic feet per minute
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
Ft^3	Cubic feet
gal	gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
in	inch
°K	Degrees Kelvin
kg	kilogram
kW	kilowatts
l	liter
LAER	Lowest Achievable Emission Rate
lb	Pound
m	Meter
MACT	Maximum Achievable Control Technology
Mg	Megagram
mmBtu	Million British thermal units
mmscf	Million standard cubic feet
mo	month
MW	Megawatt
MW-hr	Megawatt-hour
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
OM	Organic material
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods

ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	Pounds per square inch absolute
RMP	Risk Management Plan
scf	Standard cubic feet
SIC	Source Industrial Classification
SO_2	Sulfur Dioxide
T	ton
TOM	Total organic material
tpy	Tons per year
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOC	Volatile organic compound
VOL	Volatile organic liquid
VOM	Volatile Organic Material
Wt	weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Shipping operations consisting of placing finished cartons and flatpack materials in corrugated cases, palletizing, and wrapping for shipment

Cutting Machines used to cut, score, and otherwise process cartons

Manual Stripping with the occasional use of a pneumatic hammer to remove scrap from paperboard sheets

Sheeters used to covert rolls of paperboard into sheets by both a slitting and cutting process

Aerator used to realign printed paperboard sheets

Shredder used for shredding scrap paperboard

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of

less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit’s process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than

those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Non-Heatset, Offset Lithographic Press	1993 (Heidelberg No. 545, 546, Planeta No. 541), 1990 (Planeta No. 542)	None
02	Finishing Department	1993 (“Bobst Domino 90” Gluer), 1994 (“Jagenberg Diana 90” Gluer), 1994 (“Jagenberg Diana 115” Gluer), 1974 & 1980 (“Post” Gluers), 1975 (“Staude” Gluer)	None
03	Natural Gas Boilers (2) with distillate fuel backup	1948	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

   Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	238.30
Sulfur Dioxide (SO_2)	17.00
Particulate Matter (PM)	8.00
Nitrogen Oxides (NO_x)	8.00
HAP, not included in VOM or PM	---
TOTAL	271.30

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

The annual emissions from the source shall not exceed the following limitations:

Pollutant	Emissions (Tons/Year)	Underlying Rules
VOM	240	40 CFR 52.21

The source-wide limits are established to limit the VOM emissions from the source to below major source status (<250 tpy) for applicability of the federal rules for Prevention of Significant Deterioration (PSD) of Air Quality, 40 CFR 52.21. These limits, along with limits for individual significant unit limits of Condition 7.1.6, supersede limits established in Construction Permit Application No. 90120041, 91110008, and 92110006.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1 and 5.5.3, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Records for VOM

a. General Records:

i. The weight percent of VOM for inks, blanket wash, roller wash, etch solution, coatings, and adhesives used in the effective press and finishing department;

ii. The quantity of inks, blanket wash, roller wash, etch solution, coatings, and adhesives used in the effective press and finishing department (T/mo and T/yr).

b. Records maintained on a monthly basis for the previous month:

The aggregate monthly and annual VOM emissions from the affected press and finishing machine based on the usage of inks, blanket wash, roller wash, etch solution, coatings, and adhesives with supporting calculations.

5.6.3 Records for Operating Scenarios

N/A

5.6.4 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating HAP Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01: Non-Heatset, Offset Lithographic Presses Control None

7.1.1 Description

Four (4), sheetfed, non-heatset, offset lithographic printing presses that perform both printing and coating of paperboard. The Planeta presses can process a maximum sheet size of 44 inches x 64 inches at 7,000 sheets/hour maximum average production speed. The Heidelbergs can process a maximum sheet size of 28 inches x 40 inches at 11,000 sheets/hour maximum average production speed.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 01	Planeta Varimat No. 541	Non-heatset, offset lithographic press	None
	Planeta Varimat No. 542		
	Heidelberg No. 545		
	Heidelberg No. 546		

7.1.3 Applicability Provisions and Applicable Regulations

a. The “affected press” for the purpose of these unit-specific conditions, are non-heatset, offset lithographic presses that perform printing or coating and are identified in Condition 7.1.2.

b. Applicable Emission Limits

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart G shall only apply to photochemically reactive material [35 IAC 215.301].

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on an affected press not being subject to the 35 IAC 215.408(c), heatset web offset lithographic printing, because the affected press is non-heatset and are sheet fed, not web presses.

b. This permit is issued based on an affected press not being subject to 35 IAC 215.204(c), emission limitations for paper coating, because the affected

press performs both printing and paper coating. See "Board Note" in 35 IAC 215.204(c) which states that limitations shall not apply to equipment used for both printing and paper coating.

c. This permit is issued based on the affected press not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected press does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Operational and Production Limits and Work Practices

None

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected press is subject to the following:

a. A combined annual VOM emission limitation of 222.0 tons/year from the affected press, and:

b. A combined monthly VOM emission limitation of 37.0 tons/month from the affected press.

The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of Construction Permits 90120041, 91110008 and 92110006, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. The above limitations supersede limits established in Construction Permits 90120041, 91110008, and 92110006. [T1R]

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected press to demonstrate compliance with Conditions 5.5.1, 5.5.3, 5.6 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

a. A list giving the name of each ink, blanket wash, coating, roller wash, etch solution, alcohol, cleaning solvents, photochemically reactive material and any other VOM containing materials utilized except water.

b. VOM content for each ink, blanket wash, roller wash, coating, etch solution, alcohol, VOM containing clean-up solvent, photochemically reactive material and any other VOM containing materials utilized in the affected press except water in pounds per gallon or pounds per unit of material measure as appropriate.

c. HAP content, by weight for all inks, blanket washes, roller washes, etch solution, coatings, HAP containing clean-up solvents, photochemically reactive material, and any other HAP containing materials used in pounds per gallon or pounds per unit of material measure as appropriate.

d. Usage of all inks, blanket wash, roller wash, etch solution, coatings, alcohols, VOM and/or HAP containing clean-up solvents, photochemically reactive material, and any other VOM and/or HAP containing materials except water in pounds per month and pounds per year.

e. Amount of reclaimed inks, blanket wash, coatings, VOM and/or HAP containing clean-up solvents, photochemically reactive material and any other VOM and/or HAP containing materials except water in pounds per month and pounds per year.

f. VOM emissions in tons per month and tons per year from the affected press with the annual emission rate calculated utilizing the current month’s actual emissions plus the preceding 11 months actual emissions for a running 12 month total.

g. HAP emissions, in tons per month and tons per year.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected press with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If requested by Illinois EPA, copies of recordkeeping showing the non-compliance of Conditions 7.1.3(b) and 7.1.6 shall be forwarded to Illinois EPA within thirty (30) days following a request.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational changes with respect to the affected press without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of materials by the affected press at this source provided information is supplied as required under Condition 7.1.9, the source wide emission limitations in Conditions 5.5.1 and 5.5.3 are not exceeded and the affected press remains in compliance with Condition 7.1.3(b).

7.1.12 Compliance Procedures

a. Compliance with the emission limits in Conditions 5.5.1, 5.5.3, and 7.1.3(b) shall be based on the recordkeeping requirements in Condition 7.1.9 and, if deemed necessary by Permittee, the formulas listed below:

i. VOM emissions from affected presses shall be calculated based on the following mass balance:

$$\begin{aligned} VOM = & \sum_{i=1}^{n} \left[\left(I_{U_i} - I_{R_i}\right)(1 - R_F)\left(I_{V_i}\right)\right] + \sum_{i=1}^{n} \left[\left(P_{U_i} - P_{R_i}\right)\left(P_{V_i}\right) \right] \\ & + \sum_{i=1}^{n} \left[\left(B_{U_i} - B_{R_i}\right)\left(B_{V_i}\right) \right] + \sum_{i=1}^{n} \left[\left(R_{U_i}\right)\left(R_{V_i}\right) \right] \\ & + \sum_{i=1}^{n} \left[\left(C_{U_i}\right)\left(C_{V_i}\right) \right] + \left[\left(A_U\right)\left(A_V\right) \right] + \left[\left(E_U\right)\left(E_V\right) \right] \end{aligned}$$

Where:

i = Subscript denoting a specific ink, blanket wash, roller wash, coating, or photochemically reactive material;

n = The number of different inks, blanket wash, roller wash, and coatings, or photochemically reactive material;

I_U = The usage amount of a specific ink;

I_R = The reclaimed amount of a specific ink;

R_F = The retention factor on the printing substrate which is 95%;

I_V = The weight percent VOM of a specific ink;

B_U = The usage amount of a specific blanket wash;

B_R = The reclaimed amount of a specific blanket wash;

B_V = The weight percent VOM of a specific blanket wash;

P_U = The usage amount of specific photochemically reactive material;

P_R = The reclaimed amount of a specific photochemically reactive material;

P_V = The weight percent of VOM of a specific photochemically reactive material;

R_U = The usage amount of a specific roller wash;

R_V = The weight percent VOM of a specific roller wash;

C_U = The usage amount of a specific coating;

C_V = The weight percent VOM of a specific coating;

A_U = The usage amount of alcohol;

A_V = The weight percent VOM of alcohol;

E_U = The usage amount of etch solution; and

E_V = The weight percent VOM of etch solution.

ii. HAP emissions from the affected press shall be calculated based on the following:

$$HAP = \sum_{i=1}^{n} \left[(I_U)(I_H) \right] + \sum_{i=1}^{n} \left[(B_U)(B_H) \right] + \sum_{i=1}^{n} \left[(P_U)(P_H) \right] + \sum_{i=1}^{n} \left[(R_U)(R_H) \right] + \sum_{i=1}^{n} \left[(E_U)(E_H) \right] + \sum_{i=1}^{n} \left[(C_U)(C_H) \right]$$

Where:

i = Subscript denoting a specific ink, blanket wash, roller wash, or coating;

n = The number of different inks, blanket wash, roller wash, and coatings;

I_U = The usage amount of a specific ink;

I_H = Weight percent HAP of a specific ink;

B_U = The usage amount of a specific blanket wash;

B_H = The weight percent HAP of a specific blanket wash;

R_U = The usage amount of a specific roller wash;

R_H = The weight percent HAP of a specific roller wash;

P_U = The usage amount of a specific photochemically reactive material;

P_H = The weight percent HAP of a specific photochemically reactive material;

E_U = The usage amount of etch solution;

E_H = The weight percent HAP of etch solution;

C_U = The usage amount of a specific coating; and

C_H = The weight percent HAP of a specific coating.

7.2 Unit 02: Finishing Department
Control None

7.2.1 Description

The Finishing Department processes printed and unprinted cartons utilizing an assortment of equipment which folds, glues, windows and otherwise finished individual cartons to meet customer specifications and product end use requirements. The Finishing Department readies the cartons for shipment by placing them in corrugated cases/packing, palletizing and stretch-wrapping/banding for shipment. The emissions from these operations are all considered fugitive.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 02	Bobst Domino 90	Gluing Machine	None
	Jagenberg Diana 90	Gluing Machine	None
	Jagenberg Diana 90	Gluing Machine	None
	Jagenberg Diana 115	Gluing Machine	None
	Post Straight Line	Gluing Machine	None
	Post Straight Line	Gluing Machine	None

7.2.3 Applicability Provisions and Applicable Regulations

a. The “affected finishing machine” for the purpose of these unit-specific conditions, is a machine that folds, glues, windows or otherwise finishes paperboard cartons to meet customer specifications and product end use requirement and is identified in Condition 7.2.2.

b. An affected finishing machine at the source is subject to 35 IAC 215.204(c)(1), which provides that:

i. No owner or operator of an affected finishing machine shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to paper. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied by any finishing machine:

kg/liter	lb/gallon
0.35	2.9

ii. Compounds which are specifically exempted form the definition of VOM should be treated as water for the purpose of calculating the “less water” part of the coating composites.

7.2.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected finishing machine not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected finishing machine does not use an add-on control device to achieve compliance with an emission limitation or standard.

b. Each affected finishing machine is not required to meet 35 IAC 215.301 and 215.302, Use of Organic Material, when subject to the limitations of 35 IAC 215.204 [35 IAC 215.209].

7.2.5 Control Requirements and Work Practices

None

7.2.6 Emission Limitations

In addition to Condition 5.2.2, the source wide emission limitations in Condition 5.5, and Condition 7.2.3(b), the finishing machine is subject to the following:

Emissions from the affected finishing machine shall not exceed the following limits:

	VOM Emissions	
Material	(Lbs/Month)	(Tons/Year)
Glues and Adhesive	5,330	16

These limits are established to limit the VOM emissions from the source to below major source status (<250 tpy) for applicability of the federal rules of Prevention of Significant Deterioration (PSD) of Air Quality, 40 CFR 52.21.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month’s actual emissions plus the preceding 11 months’ actual emissions for a twelve (12) month running total. [T1R]

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for affected finishing machines to demonstrate compliance with Condition 5.5.1 pursuant to Section 39.5(7)(b) of the Act:

a. A list giving the name of each adhesive used.

b. The VOM content by weight for each adhesive utilized in pounds per gallon or pounds per unit of measure as appropriate.

c. The HAP content, by weight for adhesives used in pounds per gallon or pounds per unit of measure as appropriate.

d. The usage of adhesives in pounds per month and pounds per year.

e. VOM emissions in pounds per month and tons per year with the annual emission rate calculated utilizing the current month’s actual emissions plus the previous eleven (11) month’s actual emissions for a running twelve (12) month total.

f. HAP emissions, in tons per month and tons per year.

g. The amount of reclaimed glues and adhesives in pounds per month and pounds per year should the Permittee want to claim credit against emissions.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected finishing machine with the permit requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. The notification shall described the probable cause of such deviations and any corrective actions or preventive measures taken to rectify the non-compliance.

If requested by Illinois EPA, copies of recordkeeping showing the non-compliance of Conditions 7.2.3(b) and 7.2.6 shall be forwarded to Illinois EPA within thirty (30) days following a request.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make physical, operational, or changes with respect to the glues and adhesives used by the affected sources so long as emission limits of Condition 7.2.5 are not violated. These changes may be made without any prior notification to Illinois EPA or revision to the permit. This conditions does not affect the Permittee's obligation to properly obtain a Construction Permit in a timely manner for any activity constituting construction or modification of the source as defined in 35 IAC 201.102.

7.2.12 Compliance Procedures

a. Compliance with emission limits in Conditions 5.2, 5.5.3, 7.2.3(b), and 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9 and, if deemed necessary by Permittee, the formulas listed below:

i. VOM emissions from affected finishing machine shall be calculated based on the following:

$$VOM = \sum_{i=1}^{n} \left[\left(G_{U_i} - G_{R_i}\right)\left(G_{V_i}\right) \right]$$

Where:

i = Subscript denoting a specific adhesive;

n = The number of different adhesives;

G_U = The usage amount of a specific adhesive;

G_R = The reclaimed amount of a specific adhesive; and

G_V = The weight percent VOM of a specific adhesive excluding water and other exempted compounds.

ii. HAP emissions from affected finishing machine shall be calculated based on the following:

$$HAP = \sum_{i=1}^{n} \left[\left(G_{U_i} - G_{R_i}\right)\left(G_H\right) \right]$$

Where:

i = Subscript denoting a specific adhesive;

n = The number of different adhesives;

G_U = The usage amount of a specific adhesive;

G_R = The reclaimed amount of a specific adhesive; and

G_H = The weight percent of HAP of a specific adhesive excluding water and other exempted compounds.

7.3 Unit 03: Boilers
Control None

7.3.1 Description

Two natural gas fired boilers (6.4 mmBtu/hr each) that utilize distillate fuel oil as back-up.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 03	Boilers No. 1 & 2	Natural gas-fired boilers Maximum heat input capacity: 6.4 mmBtu/hr each	None

7.3.3 Applicability Provisions and Applicable Regulations

a. An “affected boiler” for the purpose of these unit-specific conditions, is a steam generating unit that is fired with natural gas and uses distillate fuel oil as backup energy source, with a heat input capacity less than 10 mmBtu/hr.

b. i. The emissions of particulate matter (PM) into the atmosphere in any one hour period shall not exceed 0.15 kg/MW-hr (0.10 lb/mmBtu) of actual heat input from any fuel combustion emission unit using liquid fuel exclusively [35 IAC 212.206].

ii. The emission of sulfur dioxide (SO_2) into the atmosphere in any one hour period from any existing fuel combustion emission unit, burning liquid fuel exclusively shall not exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lb/mmBtu) [35 IAC 214.161(b)].

7.3.4 Non-Applicability of Regulations of Concern

a. An affected boiler is not subject to the new Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, because the federal regulation applies to units constructed, reconstructed, or modified after June 9, 1989, with firing rates of 100 mmBtu/hr or less, but greater than 10 mmBtu/hr.

b. An affected boiler is not subject to 35 IAC 216.122, emissions of carbon monoxide (CO) from fuel combustion emission units, because the actual heat

input of an affected boiler is less than 2.9 MW (10 mmBtu/hr).

c. An affected boiler is not subject to 35 IAC 215.301, Use of Organic Material because fuel combustion emission units are exempt, pursuant to 35 IAC 215.303.

d. This permit is issued based on the affected boiler not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected boiler does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.3.5 Operational Production Limits and Work Practices

a. An affected boiler shall only be operated with natural gas or distillate fuel oil as the fuel.

b. The Permittee shall not use distillate fuel oil (Grades No. 1 and 2 fuels) in an affected boiler with a sulfur content greater than the larger of the following two values:

i. 0.28 weight percent, or

ii. The Wt percent given by the formula:

Maximum Wt percent sulfur = (0.000015) x (gross heating value of oil, Btu/lb).

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, and Condition 7.3.3(b), the affected boiler is subject to the following:

None

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1 and 7.3.5 pursuant to Section 39.5(7)(b) of the Act:

a. Total annual natural gas usage for the affected boiler (ft^3/yr);

b. Total distillate fuel oil usage for the affected boiler (gallons/year);

c. The maximum sulfur content (in Wt %) for each shipment of distillate fuel oil used in the affected boiler; and

d. Annual aggregate NO_x, PM, SO_2, CO and VOM emissions from the affected boiler, based on fuel consumption and the applicable emission factors of Condition 7.3.12, with supporting calculations utilizing the current month's actual emissions plus the previous eleven (11) month's actual emissions for a running total of twelve (12) months.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

a. Notification within 30 days of operation of the affected boiler that may not have been in compliance with the opacity limitations in Condition 5.2.2.

b. If there is an exceedance of the sulfur content of the distillate fuel oil in excess of the limit specified in Condition 7.3.5, the Permittee shall submit a report within 30 days after receipt of a noncompliance shipment of distillate fuel oil.

c. Emissions of NO_x, PM, SO_2, or VOM from the affected boiler in excess of the limits specified in Condition 5.5.1 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.3.12 Compliance Procedures

a. Compliance with Condition 7.3.3(b)(i) is demonstrated under inherent operating conditions of the affected boiler when the liquid fuel fired is distillate fuel oil, so that no compliance procedures are set in this permit addressing this regulation.

b. Compliance with Condition 7.3.3(b)(ii) is demonstrated under inherent operating conditions of the affected boiler fired by distillate oil with a sulfur content meeting the specification of Condition 7.3.5(b), so that no compliance procedures are set in this permit addressing this regulation.

c. Compliance with the emission limits in Condition 5.5.1 and 5.5.3 shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

i. Emissions from the affected boiler combusting natural gas shall be calculated based on the following emission factors:

Pollutant	Emission Factor (lb/mmscf)
CO	84
NO_x	100
PM	7.6
SO_2	0.6
VOM	2.3

These are the emission factors for natural gas combustion in commercial boilers (<100 mmBtu/hr, uncontrolled), Tables 1.4-1 and 1.4-2, AP-42, 5th ed., Volume I, Supplement D, 1998.

Boiler Emissions (lb) = natural gas consumed (mmscf) multiplied by the appropriate emission factor.

ii. Emissions from the affected boiler combusting distillate fuel oil shall be calculated based on the following emission factors:

Pollutant	Emission Factor (lb/1000 gal)
CO	5
NO_x	20
PM	2
SO_2	142S
VOM	0.34

These are the emission factors for uncontrolled distillate fuel oil combustion in commercial/institutional boilers, Tables 1.3-1 and 1.3-2, AP-42, 5th ed., Volume I, October 1996. “S” indicates that the Wt % of sulfur

in the distillate fuel oil should be multiplied by the value given.

Boiler Emissions (lb) = distillate fuel oil consumed (10^3 gallons) multiplied by the appropriate emission factor.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after April 5, 2001 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this

permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

   i. Describe the physical or operational change;

   ii. Identify the schedule for implementing the physical or operational change;

   iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

   iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

   v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 (“Title I provisions”) and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance

certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements

underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.1 Attachment 1 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.2 Attachment 2 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;

2. Minor Permit Modification; and

3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment

- Corrects typographical errors;

- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

- Requires more frequent monitoring or reporting by the Permittee;

- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;

- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or

- Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

- Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

    - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and

    - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.

- Are not modifications under any provision of Title I of the CAA; and

- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

- The source’s suggested draft permit/conditions;

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;

- Applications requesting a relaxation of reporting or recordkeeping requirements; and

- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or

- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.

Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	ID number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information

1. Source name:		
2. Source street address:		
3. City:		4. Zip code:
5. Is the source located within city limits?		☐ Yes ☐ No
6. Township name:	7. County:	8. ID number:

Owner Information

9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)

14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information

19. Who is the applicant? ☐ Owner ☐ Operator	20. All correspondence to: (check one) ☐ Owner ☐ Operator ☐ Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	☐ Yes ☐ No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	☐ Yes ☐ No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	☐ Yes ☐ No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	☐ Yes ☐ No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	☐ Yes ☐ No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	☐ Yes ☐ No ☐ Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.

30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.
Authorized Signature:

BY:

_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.4 Attachment 4 Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.

2. A completed compliance certification for the source. For this purpose, the Illinois EPA will accept a copy of the most recent form 401-CAAPP, ANNUAL COMPLIANCE CERTIFICATION submitted to the Illinois EPA.

3. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.

4. Information addressing any outstanding transfer agreement pursuant to the ERMS.

5. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

   b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.html.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506