

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
REVISED

PERMITTEE

Graphic Packaging Corporation
Attn: Arthur E. Rideout
2333 South Wabash Avenue
Centralia, Illinois 62801

Application No.: 99100072

I.D. No.: 121802AAK

Applicant's Designation: FESOP

Date Received: December 19, 2001

Subject: Printing Presses

Date Issued: March 1, 2002

Expiration Date: May 8, 2005

Location: 2333 South Wabash Avenue, Centralia

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 5 lithographic/flexographic printing lines and ink mixing operation pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) 100 tons/yr, any single hazardous air pollutant (HAP) 10 tons/yr, and any combination of hazardous air pollutants (HAPs) 25 tons/yr). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
3. Emissions and operation of 5 printing lines and ink mixing operation shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Lb/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
Offset EB/UV Inks*	16,820	168,000	841	4.20
EB Coatings	1,450	14,500	1,450	7.25
Flexographic Inks	1,950	19,500	1,950	9.75
Flexographic Coating	4,464	44,640	4,464	22.32
Fountain Solution	1,572	15,720	1,572	7.86
Adhesives	1,100	11,000	1,100	5.50
Clean-Up Solvents	8,022	80,220	8,022	40.11

* Includes ink mixing operation

These limits are based on complete evaporation of volatile organic materials, standard AP-42 emission factors, Material VOM Usage = Material Usage x Material VOM Content, and information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 8 lb/hour of organic material into the atmosphere from any emission source except if no odor nuisance exists this rule shall only apply to photochemically reactive material.
5. The Permittee shall maintain the following records:
 - a. Name, usage (lb/mo, lb/yr), HAP and VOM content (% wt. or lb/gal), and HAP and VOM emissions (lb/mo, ton/yr) of the following:
 - i. Printing inks;
 - ii. Printing coatings;
 - iii. Fountain solution;
 - iv. Adhesives; and
 - v. Clean-up solvents.
6. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
7. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in

Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

9. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: VOM and/or HAP containing material usage records from Condition #5.

It should be noted that this permit has been revised to incorporate the flexographic printing unit from Construction Permit #02020085 and to add the ink mixing operation and revise equipment description.

If you have any questions on this, please call Eric Jones at 217/782-2113.

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

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cc: Illinois EPA, FOS Region 3
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from 5 printing presses operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 100 tons per year of VOM, 10 tons per year of any single HAP, and 25 tons per year of any combination of HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled.

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Introduction:

Graphic Packaging Corporation for a Printing Operation has submitted an Application for a Federally Enforceable State Operating Permit (FESOP). This Application has been submitted in order to incorporate federally enforceable limits. These limits would prevent the facility from being a major source of Volatile Organic Material (VOM), and thereby relieving them of having to obtain a Clean Air Act Permit Program (CAAPP). Included with these federally enforceable limits would be specific recordkeeping and reporting requirements to assure that the facility is operated as a non-major source. These conditions would be enforced by both the USEPA and Illinois EPA.

Source Description:

Graphic Packaging Corporation is located in Centralia, Illinois. This facility produces folding boxes/cartons, primarily for the food and beverage industry. Various inks and coatings are applied to this paperboard substrate, as determined by individual customer needs.

Emissions:

Emissions of VOM and Hazardous Air Pollutants (HAPs) from the printing operations will occur when the VOM and HAP contained in the various coating and inks volatilize. Emissions of Carbon Monoxide (CO) and Nitrogen Oxides (NOx) will occur from the combustion of Natural Gas.

Applicable Emission Standards:

All emission sources in Illinois must comply with the emission standards set by the Illinois Pollution Control Board. The Pollution Control Board's emission standards represent the basic requirements for sources in Illinois. The Pollution Control Board has emission standards for VOM, NOx, CO and HAP's. The Graphic Packaging Corporation readily complies with all emission standards set forth by the Pollution Control Board.

Proposed Permit:

The conditions in this FESOP are designed to ensure that this facility is continually operated as a non-major source. This permit has conditions that limit the usage of inks, coatings, adhesives and clean-up solvents. This permit also contains conditions of specific recordkeeping and reporting requirements. Graphic Packaging Corporation must carry out these procedures on an ongoing basis to demonstrate compliance with the limits set forth in this FESOP.

Request for Comments:

It is the Illinois EPA preliminary determination that the facility meets all applicable state and federal air pollution control regulations. The Illinois EPA is therefore proposing the issuance of this FESOP with all of the specific requirements contained in the permit. Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on this draft FESOP. If substantial interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Ad. Code Part 166.