

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
1021 N. Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

Project Summary
Federally Enforceable State Operating Permit (FESOP)
Graph-Pak Corp.
11250 Addison Avenue
Franklin Park, Illinois 60131

Site Identification No.: 031096ALH
Application No.: 08060064

Illinois EPA Contacts

Permit Analyst: David Hulskotter
Community Relations Coordinator:

Brad Frost
217/782-7027
Brad.frost@illinois.gov

I. INTRODUCTION

Graph-Pak Corporation has applied for a Federally Enforceable State Operating Permit (FESOP) for its printing plant. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the permit that it would propose to issue for the plant. However, before issuing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue. General Packaging Products is currently operating under a FESOP permit.

II. SOURCE DESCRIPTION

The Graph-Pak Corporation is located at 11250 Addison Street in Franklin Park. This facility is comprised of three sheet fed offset presses, two flexographic web presses and five gluers. The printing inks, glues and solvents contain organic solvents which are emitted to the atmosphere during the printing process as volatile organic material (VOM). These materials also contain components that are considered hazardous air pollutants (HAPs).

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source will be operating this plant under a FESOP permit. Because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. The source is now applying for a FESOP revision. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need not obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The Board has specific standards for units emitting volatile organic material in the greater Chicago Area. The printing operation at Graph-Pak Corporation is regulated by 35 Ill. Adm. Code 218.207. These regulations require the fountain solution to be five percent VOM by volume or less. Cleaning solutions used on any lithographic printing lines are required to be thirty percent VOM or less or they are required to have a low VOM composite partial vapor pressure less than 10 mmHg at 20°C (68°F). The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

V. CONTENTS OF THE PERMIT

The permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.) These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions would also require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for issuance of its permit. The Illinois EPA is therefore proposing to issue the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.