

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
The Label Printers L.P.
Federally Enforceable State Operating Permit (FESOP)
1700 - 1710 North Landmark Road, Aurora, Illinois

Site Identification No.: 089407ABB
Application No.: 08090042

Schedule

Public Comment Period Begins: October 23, 2013
Public Comment Period Closes: November 22, 2013

Illinois EPA Contacts

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I. INTRODUCTION

The Label Printers L.P. has voluntarily applied for an operating permit for its corrugated cardboard manufacturing facility in order to incorporate federally enforceable limits. These limits would prevent the facility from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. 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 revised 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.

II. SOURCE DESCRIPTION

The Label Printers L.P. operates label printing facility comprised of eighteen flexographic printing presses, one HP Indigo offset digital presses and five letterpress printing presses. The inks are applied to the web of paper substrate. Various organic solvents are used as fountain solution and in clean-up operations. The principal air contaminant emitted from the facility is Volatile Organic Material (VOM), generated during the ink application and from solvents usage. Some of the organic solvents may contain hazardous air pollutants (HAP).

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 has to operate this plant under a FESOP 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 Clean Air Act and regulations promulgated thereunder. 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 for this program. 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 to 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, e.g., 35 IAC, Part 218, Subpart E – Solvent Cleaning, Subpart F – Coating Operations, Subpart H - Printing Operations.

Lithographic and letterpress printing is eligible for exemption from requirements of 35 Ill. Adm. Code 218.187 - Other Industrial Solvent Cleaning Operations.

Printing and paper coating operations performed on flexographic printing presses are eligible for exemption from emission standards of 35 Ill. Adm. Code 218 Subpart H due to restriction of VOM emissions below 25 tons per year but are subject to general VOM emission limitation found in 35 IAC 218.301 – Use of Organic Material.

Lithographic and letterpress printing are eligible for exemption from 35 Ill. Adm. Code 218.407 and 218.412, respectively, due to restriction of VOM emissions below 15 lbs/day from each group.

The paper coating operations performed on the lithographic and letterpress printing presses are subject to 35 IAC 218.204(c).

The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

The renewed 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. As explained, the non-coating equipment cleaning operations are subject to 35 IAC 218.187 control requirements, which restricts VOM content of cleaning solutions. Flexographic printing operations are exempt from 35 IAC 218.401 control requirements, lithographic printing operations are subject to VOM control requirements of 35 IAC 218.407. 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.)

The permit conditions would also continue to 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 renewal of its permit. The Illinois EPA is therefore proposing to renew 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.