

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Dopaco, Inc.
Attn: Phoebe C. Robb
100 Arrandale Boulevard
Exton, Pennsylvania 19341-2544

<u>Application No.:</u> 95090108	<u>I.D. No.:</u> 089483ABV
<u>Applicant's Designation:</u>	<u>Date Received:</u> March 27, 2002
<u>Subject:</u> Paper Carton and Cup Printing and Forming Plant	
<u>Date Issued:</u> May 29, 2002	<u>Expiration Date:</u> September 9, 2003
<u>Location:</u> 315 Kirk Road, St. Charles	

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of three rotogravure printing presses with dryers, eight jet printers, one lids thermoforming/trimming press controlled by cyclone and filter, three cold degreasers, one alkaline parts cleaner, and four scrap collector/balers controlled by cyclones and filters 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., 25 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result, the source is excluded from the requirements 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 for this location.
2. This permit is issued based upon the rotogravure printing presses not being subject to the VOM control requirements of 35 Ill. Adm. Code Part 218, Subpart H: Printing and Publishing, Section 218.401: Flexographic and Rotogravure Printing. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit of VOM to less than 25 tons per year from the subject sources.
3. This permit is issued based upon three cold degreasers are subject to the requirements of 35 Ill. Adm. Code Part 218, Subpart E: Solvent

Cleaning and shall comply with operating, equipment and material requirements of Section 218.182.

4. The VOM emissions from printing presses, jet printers, alkaline cleaner and three cold degreasers shall not exceed the following limits: 4.0 ton/mo, 19.5 ton/yr.

The VOM emissions shall be determined from the following equation on a monthly basis:

$$E = (M_i \times C_i) - (W_j \times C_j)$$

Where:

- E - VOM emissions (tons)
- M_i - VOM-containing raw material usage (tons)
- C_i - VOM content of the raw material (wt. %)
- W_j - Waste material shipped off-site (tons)
- C_j - VOM content of the waste material (wt. %)

These limits define the potential emissions of the VOM and are based on the maximum actual emissions determined from the maximum production capacity and VOM content of raw materials. 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.

5. The VOM emissions from the lids thermoforming press shall not exceed 0.1 ton/mo and 0.5 ton/yr. These limits are based on the polystyrene resin process rate of 800 tons/mo and 4,750 tons/yr and resin manufacturer's emission factor of 105 lb of VOM/million pounds of resin processed.
6. The emissions of 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 by rule which would require the Permittee to obtain a Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.
7. Operation and emissions of the dryers shall not exceed the following limits:

Natural Gas Usage		Pollutant	Emission Factor	Emissions	
(mmscf/Mo)	(mmscf/Yr)		(lb/mmscf)	(T/Mo)	(T/Yr)
4	35	Nitrogen Oxides (NO _x)	100	0.2	1.8
		Carbon Monoxide (CO)	84	0.2	1.5

These limits are based on the maximum operating rate and standard emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

8. This permit is issued based on negligible emission of particulate matter from the lids thermoforming/trimming press and scrap collection system. For this purpose, emission from each emission source shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 ton/year.

9. The Permittee shall maintain monthly records of the following items:
 - a. Names and amounts of inks, solvents, resins and other VOM containing materials used (tons/mo, tons/yr);
 - b. VOM and HAP content of materials in item (a)(wt %);
 - c. VOM and HAP emission calculations (ton/mo, tons/yr); and
 - d. Natural gas usage (mmscf/mo, mmscf/yr).
10. 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 and 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 the Illinois EPA request for records during the course of a source inspection.
11. 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, a description of the exceedances or violation, and efforts to reduce emissions and future occurrences.
12. The Permittee shall submit the following additional information with the Annual Emission Report, due May 1st of each year: annual inks, solvents, resins and natural gas usage from the prior calendar year.

It should be noted that this permit has been revised to include operations of alkaline cleaner without any increase in total VOM emissions. This revision does not relax monitoring, recordkeeping, or reporting requirements contained in federally enforceable conditions of this permit. These permit conditions assure that this source would not be a major source for purpose of CAAPP.

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

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

DES:VJB:jar

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Paper Carton and Cup Printing and Forming Plant 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. This is use of 20.0 tons of volatile organic materials in inks, solvents and resins per year. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled HAP 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 material is handled, and control measures are more effective than required in this permit.

1. The VOM emissions from the printing presses, jet printers, alkaline cleaner and cold degreasers shall not exceed the following limits: 4.0 ton/mo, 19.5 ton/yr.

The VOM emissions shall be determined from the following equation on a monthly basis:

$$E = (M_i \times C_i) - (W_j \times C_j)$$

Where:

E - VOM emissions (tons)

M_i - VOM-containing raw material usage (tons)

C_i - VOM content of the raw material (wt. %)

W_j - Waste material shipped off-site (tons)

C_j - VOM content of the waste material (wt. %)

2. The VOM emissions from the lids thermoforming press shall not exceed 0.1 ton/mo and 0.5 ton/yr. These limits are based on the polystyrene resin process rate of 800 tons/mo and 4,750 tons/yr and resin manufacturer's emission factor of 105 lb of VOM/million pounds of resin processed.
3. The emissions of 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 by rule which would require the Permittee to obtain a Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.
4. Operation and emissions of the dryers shall not exceed the following limits:

<u>Natural Gas Usage</u>		<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>		<u>(lb/mmscf)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
4	35	Nitrogen Oxides (NO _x)	100	0.2	1.8
		Carbon Monoxide (CO)	84	0.2	1.5

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5. This permit is issued based on negligible emission of particulate matter from the lids thermoforming/trimming press and scrap collection system. For this purpose, emission from each emission source shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 ton/year.

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October 13, 2000

Dopaco, Inc.
Attn: Phoebe C. Robb
100 Arrandale Boulevard
Exton, Pennsylvania 19341-2544

Re: Site Fee Reconsideration
I.D. #089483ABV

Dear Mr. Robb:

This is in response to your letter dated September 19, 2000 requesting reconsideration of the annual air pollution site fee.

The Illinois EPA has reviewed your request and your annual air pollution site fee has been reduced from \$1,000.00 to \$100.00. Enclosed is a copy of your site's revised permit(s) which reflect the changes in permit limits.

Attached is a site fee invoice, which reflects the Illinois EPA's determination. If your invoice indicates an amount due, payment is due to the Illinois EPA 30 days from the date on the invoice. If a credit amount is shown it will be credited to your site for future billings. The invoice reflects all monies owed and/or paid for current billing year, unless otherwise stated.

If you have any questions, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
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cc: Region 1