

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEES

Graphic Packaging Corporation
Attn: Jamie Huller
2333 South Wabash Avenue
Centralia, Illinois 62801

Graphic Packaging Corporation
Attn: Paul Browning
One Cahill Drive
Centralia, Illinois 62801

Application No.: 99100072

I.D. No.: 121802AAK

Applicant's Designation: FESOP

Date Received: June 25, 2003

Subject: Folding Carton Manufacturing

Subject: Paperboard Lamination

Date Issued:

Expiration Date: May 8, 2005

Locations: 2333 South Wabash Avenue and One Cahill Drive, Centralia

This permit is hereby granted to the above-designated Permittees to OPERATE emission unit(s) and/or air pollution control equipment consisting of five web non-heatset offset lithographic printing lines and ink mixing operation (2333 South Wabash Avenue location) and four polyethylene pellet storage silos with pneumatic conveying system controlled by four filters, two laminating lines and four ozone surface treatment generators (One Cahill Drive location) 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 combined emissions of air pollutants from two Graphic Packaging Corporation plants (located at 2333 South Wabash Avenue and One Cahill Drive, I.D. 121422ABV), which constitute a single source for the purpose of Clean Air Act Permit Program (CAAPP), to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totalled HAP). As a result, the plants are excluded from the requirement to obtain a CAAPP permit. The maximum emissions of the plants, 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 these locations.
- 2a. Combined VOM emissions from both plants shall not exceed 8.0 tons/month and 90.0 tons/yr.
- b. 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.

- c. VOM and HAP emissions shall be determined from the following equation:

$$E = \sum(I_{Li} \times V_{Li} \times 0.05) + \sum(M_j \times V_{Mj}), \text{ where}$$

- E - VOM/HAP emissions (ton);
I_{Li} - lithographic ink usage (ton);
V_{Li} - VOM/HAP content of lithographic ink (wt. fraction);
M_j - other VOM/HAP-containing materials (coatings, adhesives, clean-up solvents, etc.) usage (ton);
V_{Mj} - VOM/HAP content of other materials (fraction).

These limits define potential emissions of VOM and HAP from two plants and are based on actual emissions determined by maximum operation and material balance. Compliance with annual limits shall be determined from a running total of 12 months of data.

3. Emission of ozone from four ozone generators shall not exceed 7.1 lb/hour and 31.0 tons/year. These limits are based on the manufacturer's specification and year round operations.
4. This permit is issued based on negligible emission of particulate matter from the polyethylene storage and conveying operations. For this purpose emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
5. 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, with the following exception: if no odor nuisance exists this rule shall only apply to photochemically reactive material.
6. The Permittees shall maintain monthly records of the following items:
 - a. Names and amounts of all VOM/HAP-containing materials used (tons/mo, tons/yr);
 - b. VOM and HAP content of materials used (wt %);
 - c. VOM and HAP emission calculations (tons/mo, tons/yr).
7. 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.
8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittees 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.

9. 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

10. The Permittees shall submit the following additional information with the Annual Emissions Reports, due May 1st of each year: VOM and/or HAP-containing materials usage (tons/yr).

It should be noted that this permit has been revised to incorporate the operations of One Cahill Drive facility (I.D. 121422ABV) and modify operating and production limitations for both facilities.

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:

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 two Graphic Packaging Corporation plants comprising a single source 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 source. The resulting maximum emissions are 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.

- 1a. Combined VOM emissions from both plants shall not exceed 8.0 tons/month and 90.0 tons/yr.
- b. 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.
- c. VOM and HAP emissions shall be determined from the following equation:

$$E = \sum(I_{Li} \times V_{Li} \times 0.05) + \sum(M_j \times V_{Mj}), \text{ where}$$

- E - VOM/HAP emissions (ton);
- I_{Li} - lithographic ink usage (ton);
- V_{Li} - VOM/HAP content of lithographic ink (wt. fraction);
- M_j - other VOM/HAP-containing materials (flexo inks, coatings, adhesives, clean-up solvents, etc.) usage (ton);
- V_{Mj} - VOM/HAP content of other materials (fraction).

2. Emission of ozone from four ozone generators shall not exceed 7.1 lb/hour and 31.0 tons/year. These limits are based on the manufacturer's specification and year round operations.
3. This permit is issued based on negligible emission of particulate matter from the polyethylene storage and conveying operations. For this purpose emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

VJB: