

217/782-2113

RENEWAL
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Pactiv Corporation
Attn: Charles L. Parmenter
801 5th Avenue
Belvidere, Illinois 61008

Application No.: 88010053 I.D. No.: 007005AAN
Applicant's Designation: Date Received: July 18, 2005
Subject: Pressed Paperboard Food Tray Converting Plant with Printing Operation
Date Issued: Expiration Date:
Location: 801 - 5th Avenue, Belvidere

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of two flexographic printing lines with two dryers, four ink jet printing systems, and a thermal embossing printer as described in 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 potential emissions of volatile organic material (VOM) and hazardous air pollutants (HAPs) from the source to less than major source thresholds (i.e. 100 tons/year for VOM, 10 tons/year for single HAP and 25 tons/year for all HAPs combined), as further described in Attachment A. As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes the current permit(s) issued for this location.
- 2a. Emissions of volatile organic material and operation of the two flexographic printing lines, ink jet printing systems, and a thermal embossing printer shall not exceed the following limits:

<u>Ink Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(% Weight)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
33	200	20	6.6	40.0
<u>*Cleanup Solvent Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
<u>(Lbs/Mo)</u>	<u>(Lbs/Yr)</u>	<u>(% Weight)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
100	1,000	100	0.05	0.5

* The cleanup solvent usage limit includes only cleanup solvents that contain VOM.

These limits define the potential of VOM emissions and is based on maximum VOM content and ink and cleanup solvent usage. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus preceding 11 months of data.

- b. Emissions of hazardous air pollutants (HAPs) and operation of the two flexographic printing lines, ink jet printing systems, and a thermal embossing printer shall not exceed the following limits:

Ink Usage		HAP Content (% Weight)	HAP Emissions		
(Tons/Mo)	(Tons/Yr)		(Tons/Mo)	(Tons/Yr)	
33	200	4.5	1.49	9.0	Single HAP
		12.0	3.96	24.0	Combined HAPs

*Cleanup Solvent Usage		HAP Content (% Weight)	HAP Emissions		
(Lbs/Mo)	(Lbs/Yr)		(Tons/Mo)	(Tons/Yr)	
100	1,000	10	0.005	0.05	Single HAP
		12	0.006	0.06	Combined HAPs

* The cleanup solvent usage limit includes only cleanup solvents that contain HAPs.

These limits define the potential of HAPs emissions and is based on maximum HAPs content and ink and cleanup solvent usage. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus preceding 11 months of data.

- 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. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hour) of organic material into the atmosphere from any emission unit. If no odor nuisance exists the limitation of this subpart shall apply only to photochemically reactive material.
- 5. The Permittee shall maintain records of the following items:
 - a. The name and identification number of each ink and VOM containing cleanup solvent as applied;
 - b. VOM content of each individual ink and VOM containing cleanup solvent;

- c. Individual and total HAP content of each individual ink and VOM containing cleanup solvent;
- d. Amount of each individual ink and VOM containing cleanup solvent used;
- e. Calculations of VOM emissions using the following equation (tons/month and tons/year):

$$V_e = \sum_{i=1}^n A_i B_i$$

Where:

V_e = Total VOM emissions from all flexographic lines, ink jet printing systems and thermal embossing printer each month in units of lbs/month or tons/month

n = Number of different inks as applied and different VOM containing cleanup solvent used each month on the flexographic lines, ink jet printing systems and thermal embossing printer

i = Subscript denoting an individual ink and VOM containing cleanup solvent

A_i = VOM content of each individual ink and VOM containing cleanup solvent (% weight or lbs/gallon)

B_i = Amount of each individual ink and VOM containing cleanup solvent used each month (lbs or gallons)

- f. Calculations of individual and total HAP emissions using the following equation (tons/month and tons/year):

$$H_e = \sum_{i=1}^n C_i D_i$$

Where:

H_e = HAP emissions from all flexographic lines, ink jet printing systems and thermal embossing printer each month in units of lbs/month or ton/month

n = Number of different inks as applied and VOM containing cleanup solvent each month on the flexographic lines, ink jet printing systems and thermal embossing printer

i = Subscript denoting an individual ink and VOM containing cleanup solvent

C_i = HAP content of each individual ink and VOM containing cleanup solvent (% weight or lbs/gallon)

D_i = Amount of each individual ink and VOM containing cleanup solvent used each month (lbs or gallons).

6. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five 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
5415 North University
Peoria, Illinois 61614

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

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

DES:GMK:jar

cc: Illinois EPA - FOS Region 2
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the Pactiv facilities printing operations (flexographic printing, ink jet printers and thermal embossing printer) 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 below the levels, (e.g., 10 tons per year of any single HAP, 25 tons per year of combined HAPs, and 100 tons per year of VOM) 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 and control measures are more effective than required in this permit.

<u>Process</u>	<u>VOM</u>	<u>EMISSIONS (Tons/Year)</u>	
		<u>Single HAP</u>	<u>Combined HAPs</u>
Ink Usage	40.0	9.00	24.00
Clean-Up Solvent Usage	<u>0.5</u>	<u>0.05</u>	<u>0.06</u>
Totals	40.5	9.05	24.06

GMK:psj