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1.0 SOURCE IDENTIFICATION

1.1 Source

Dart Container Corporation of Illinois
310 South Evergreen Drive
North Aurora, Illinois 60542
630/896-4631

I.D. No.: 089060AAR
Standard Industrial Classification: 3086, Plastics Foam Products

1.2 Owner/Parent Company

Dart Container Corporation of Illinois
310 South Evergreen
North Aurora, Illinois 60542

1.3 Operator

Dart Container Corporation of Illinois
310 South Evergreen
North Aurora, Illinois 60542

Michael Powell/Plant Manager
630/896-4631

1.4 General Source Description

The Dart Container Corporation of Illinois is located at 310 South Evergreen, North Aurora. The source manufactures Polystyrene cups and trays from expandable polystyrene beads.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
Agency	Illinois Environmental Protection Agency
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
°C	Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
cm	Centimeter
CO	Carbon Monoxide
ERMS	Emission Reduction Marketing System
°F	Fahrenheit
gal	gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification number of source, assigned by the Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
in	inch
KPa	Kilopascal
Kg	Kilogram
KW	Kilowatts
l	Liter
LAER	Lowest Achievable Emission Rate
lb	pound
LEL	Lower Explosive Limit
m ³	Cubic meter
MACT	Maximum Achievable Control Technology
Mbtu	Million Btu
Mg	Megagram
min	Minute
mmBtu	Million British thermal units
mmft ³	Million cubic feet
mmscf	Million standard cubic foot
mo	month

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MW	Megawatt
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
psi	Pound per square inch
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
T1	Title I - Identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New - Identifies Title I conditions that are being established in this permit
T1R	Title I Revision - Identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
T	Ton
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
VOL	Volatile Organic Liquid
yr	Year
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	3-Pre-Expanders 3 -Holding Tanks 2-Blenders 3-Screeners Molding Machines 2 Expanders 2 Screeners Mold Machines 1 - Blender 4 - Expanders 4 - Screeners Mold Machines Mold Machines	3 Pre-Expanders 1972 2 - Blenders 1972 3 Screeners 1972 Molding Machines 1972 2 Expanders 1972-1979 2 Screeners 1972-1979 Molding Machines 1972-1979 1 Blender 1979-1988 4 Expanders 1979-1988 4 Screeners 1979-1988 Molding Machines 1979-1988 Molding Machines 1991	9 Expanders, 3 Blenders, 3 Holding Tanks controlled by one of the 3 existing boilers
02	Boiler #1 Boiler #2 Boiler #3	Boiler #1 - 1978 Boiler #2 - 1967 Boiler #3 - 1978	None
Fugitive VOM and PM Emission	-VOM equipment leaks and solvent cleanup -Parking lot and driveway particulates	-	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and NO_x emissions.

5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	491.21
Sulfur Dioxide (SO ₂)	122.8
Particulate Matter (PM)	12
Nitrogen Oxides (NO _x)	72.6
HAP, not included in VOM or PM	0.0
TOTAL	698.61

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR

52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Records for Operating Scenarios

N/A

5.6.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit

requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
 - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for

such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover

the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This

report shall include the following information [35 IAC 205.300]:

- i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 1,114 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 111.3954 tons.

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- A. This determination includes the use of 1996 and 1997 as baseline seasons. This determination includes use of the 1997 season as a substitute for the 1994 and 1995 seasons due to non-representative conditions in these seasons as allowed by 35 IAC 205.320(a).
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units
- Not applicable.
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
 - ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
 - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

- a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Agency on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

None

- b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reductions requirements specified in IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

Polystyrene Foam Cup Manufacturing
Finished Good Warehouse Storage

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 - Polystyrene cup manufacturing
 Control - Boilers

7.1.1 Description

The source manufactures foam containers made of expandable polystyrene (EPS) beads. The main emission from the EPS beads is pentane, a VOM containing material that is used as a blowing agent.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	3-Pre-Expanders	3-Pre-Expanders 1972	9 Expanders, 3 Blenders, 3 Holding Tanks controlled by the 3 existing boilers and associated capture system
	3-Holding Tanks	2-Blenders 1972	
	2-Blenders	3-Screeners 1972	
	3-Screeners	Molding Machines 1972	
	Molding Machines		
	2-Expanders	2-Expanders 1972-1979	
	2-Screeners	2-Screeners 1972-1979	
	Molding Machines	Molding Machines 1972-1979	
	1-Blender	1-Blender 1979-1988	
	4-Expanders	4-Expanders 1979-1988	
4-Screeners	4-Screeners 1979-1988		
Molding Machines	Molding Machines 1979-1988		
Molding Machines	Molding Machines 1991		

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected polystyrene cup manufacturing plant" for the purpose of these unit-specific conditions, is all expanders/screeners, blenders, holding tanks, and cup mold machines described in Condition 7.1.2 used in the manufacture of polystyrene containers.

- b. The "affected polystyrene cup manufacturing plant" is subject to 35 IAC 218 Subpart TT, Other Emission Units. Pursuant to 35 IAC 218.986(a), every owner or operator shall employ emission capture and control equipment which achieve an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit. [35 IAC 218.986 a)]
- c. The affected polystyrene cup manufacturing plant is subject to the limits identified in Condition 5.2.2.
- d. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified in 35 IAC 212.322. [35 IAC 212.322]
- e. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321. [35 IAC 212.321]
- f. Malfunction and Breakdown Provisions

N/A
- g. Startup Provisions after an Unplanned or Emergency Shutdown

The Permittee is authorized to operate an affected polystyrene expansion plant and capture system in violation of the applicable limit of 35 IAC Subpart TT during startup, pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual starts, and

frequency of startups. This authorization is subject to the following:

- i. This authorization only extends for a period of up to 10 minutes following the startup after an unplanned or emergency shutdown of the polystyrene expansion plant, when the captured emissions must be vented to the atmosphere because the VOC laden air stream concentration is greater than 25% of the lower explosive limit (LEL).
- ii. The Permittee shall take the following measures to minimize startup emissions after an unplanned or emergency shutdown, the duration of startups, and minimize the frequency of startups:
 - A. Implementation of established startup procedures, including monitoring of the VOC laden air stream LEL concentration every 1 minute during startup procedures.
 - B. Immediately after the LEL concentration of the VOC laden air falls below 25% and remains steady, the capture air shall be routed to the control device instead of ducting directly to the atmosphere.
- iii. The Permittee shall fulfill the applicable recordkeeping requirements of Condition 7.1.9(a).

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected polystyrene cup manufacturing plant is not subject to 35 IAC 218.301 because the VOM containing material, pentane is not a photochemically reactive material as per 35 IAC 211.4690.
- b. The affected cup molding machines, holding tanks, and screeners listed in Condition 7.1.2 are not subject to the control requirements of 35 IAC 218.986 due to the exemption in 35 IAC 218.980 (f).

7.1.5 Operational and Production Limits and Work Practices

- a. Usage of expandable polystyrene beads shall not exceed 1631.25 ton/mo and 13,050 ton/yr.
- b. Monthly mathematical averages of pentane content of the EPS beads shall not exceed 5.75%, average by weight for all EPS lots received for that given month. This shall be determined by the summation of pentane weight percents for all lots received in the given month (as determined by product MSDS sheets) divided by the number of lots for that given month.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected polystyrene cup manufacturing plant is subject to the following:

- a. Emissions from the polystyrene cup manufacturing plant and emissions from the storage of the polystyrene cups shall not exceed the following:

Process	VOM Emissions (ton/mo)	VOM Emissions (ton/yr)
Polystyrene cup manufacturing plant non-fugitive VOM emissions	25.8	207
Polystyrene cup storage fugitive VOM emissions	33.28	266.2

These limits are based on the polystyrene bead usage in Condition 7.1.5 (a) and the emission factor and control device efficiency in Condition 7.1.12.

The above limitations contain revisions to previously issued Permit 88040086. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these

revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, test results indicated that the VOM emission factor is less than what was previously permitted for the cup manufacturing plant, as a result VOM emissions remain constant with an increase in EPS bead usage. Fugitive VOM emissions from the storage operation have also been corrected to show the latest results from a test conducted by the facility.

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 (running 12 month total) [T1R].

7.1.7 Testing Requirements

When in the opinion of the Illinois EPA or USEPA it is necessary to conduct testing to demonstrate compliance with 35 IAC Subpart TT, the owner or operator of an affected polystyrene cup manufacturing plant shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105. [35 IAC 218.991(a)(4)]

7.1.8 Monitoring Requirements

The Permittee shall continuously monitor the VOM captured and destroyed through monitoring the flow rate and concentration of capture air to destruction device.

7.1.9 Recordkeeping Requirements

a. Records for Startup

The Permittee shall maintain the following records, pursuant to Section 39.5(7)(b) of the Act, for each affected polystyrene cup manufacturing process subject to Condition 7.1.3(g), which at a minimum shall include:

- i. The following information for each startup of the polystyrene cup manufacturing process:
 - A. Date and duration of the startup, i.e., start time and time normal operation achieved, i.e., amount of time required to route emissions to the control device.
 - B. If normal operation was not achieved within 10 minutes, an explanation why startup could not be achieved within this duration of time;
 - C. A detailed description of the startup, including reason for operation;
 - D. An explanation why established startup procedures could not be performed, if not performed;
 - E. Whether exceedance of Condition 5.2.2 may have occurred during startup, with explanation and estimated duration (minutes).

b. The affected polystyrene cup manufacturing plant being subject to 35 IAC 218.991(a)(2) shall collect and record all the following information each day and maintain the information at the source for a period of 3 years: [35 IAC 218.991(a)(2)]

- i. Control device monitoring data.
 - A. pentane concentration in the capture stream

- B. Counter reading for the Lb/day of pentane sent to the boilers.
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission source.
 - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non routine maintenance performed including dates and duration of any outages.
- c. Amount of polystyrene processed (ton/mo and ton/yr) for the polystyrene cup manufacturing plant.
- d. Emissions of VOM (ton/mo and ton/yr) for the polystyrene cup manufacturing plant.
- e. Polystyrene manufacturers certificate of analysis of percent pentane content by weight of polystyrene beads, as received for each shipment of EPS beads.

7.1.10 Reporting Requirements

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 Agency'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 [Section 39.5(7)(f)(ii) of the Act].

- a. Polystyrene usage in excess of the limits in Conditions 7.1.5(a).
- b. Pentane content in excess of the limits in Condition 7.1.5(b).
- c. Emission limits in excess of Condition 7.1.6(a).
- d. Records for startup after emergency shutdown.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make physical or operational change with respect to the affected polystyrene cup manufacturing plant without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102.

7.1.12 Compliance Procedures

- a. Compliance with Condition 5.5.1 and the emission limits in Condition 7.1.6 for the polystyrene cup manufacturing plant shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below.

$$\text{VOM Emissions (ton/mo)} = \text{Produced*} - \text{Controlled**}$$

* Produced is the total uncontrolled VOM emissions from all cup manufacturing processes. The average pentane content of the EPS beads prior to manufacturing is 5.75% by weight as indicated in the product MSDS sheets. The average pentane content of the cups after the final molding process and before warehousing is 3.2% as indicated by test results. Therefore, total weight percent of VOM volatilized during the cup manufacturing processes is the difference between these weight percents.

$$.0575 - .032 = .0255$$

Total uncontrolled VOM emissions emitted from the processes shall be calculated using the following equation.

$$\text{Uncontrolled Emissions Produced (ton/mo)} = \text{EPS monthly throughput (ton/mo)} \times (.0255)$$

** Controlled emissions from this source are maintained by a continuous emission monitor capable of tracking the Lb of captured pentane emissions per day. The sum of the daily pentane emissions for the

given month are than multiplied by the control efficiency of the boilers. Therefore controlled VOM emissions shall be calculated using the following equation.

$$\text{Controlled (ton/mo)} = [(\text{ Lb/day emissions from recorder for the given month}) \times (1 - \text{control device efficiency}(\%))] / 2000 \text{ Lb/ton}$$

The control device efficiency is determined from the most recent stack test.

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.

- b. Compliance with Condition 5.5.1 and the emission limits in Condition 7.1.6 for the polystyrene cup storage fugitive emissions shall be based on the emission factors and formulas listed below.

Fugitive VOM emissions from the warehousing of the polystyrene cups shall be determined based on an average of 21 days for storage. With this information coupled with an average pentane content in the cup of 3.2% prior to warehousing, and test results indicating 1.16% pentane left in the cup after the 21 day storage time, allows the formulation of the emission factor below.

$$21 \text{ days} = 1.16\% = .0204 \text{ Lb pentane/Lb EPS}$$

Fugitive VOM emissions shall be calculated using the following equation.

$$\text{Fugitive VOM (ton/mo)} = (\text{EPS usage (Lb/mo)} \times .0204 \text{ Lb pentane/Lb EPS}) / 2000 \text{ Lb/ton}$$

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.

Total monthly VOM emissions shall be determined by the sum of the fugitive and nonfugitive VOM emissions for the given month.

7.2 Unit 02 Natural Gas Boilers with #2 diesel backup (B-1, B-2, and B-3)

7.2.1 Description

Boilers B-1, B-2, and B-3 are being operated to provide process steam and building heat. All three boilers fire natural gas as the main fuel with boilers B-1 and B-3 having the capability to fire diesel as a backup fuel.

7.2.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
B-1	Boiler B-1 Cleaver Brooks rated at 25.1 mmBtu/hr	None
B-2	Boiler B-2 Orr and Sembower rated at 25.1 mmBtu/hr	None
B-3	Boiler B-3 Cleaver Brooks rated at 29.3 mmBtu/hr	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit specific conditions, is each boiler listed in Condition 7.2.2.
- b. No person shall cause or allow the emission of carbon monoxide into the atmosphere from the affected boilers to exceed 200 ppm, corrected to 50 percent excess air on a per boiler basis [35 IAC 216.121].
- c. The affected boilers are subject to the limits identified in Condition 5.2.2.
- d. Affected boilers B-1 and B-3 shall not cause or allow the emission of particulate matter into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hr of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lbs/mmBtu). [35 IAC 212.206]
- e. Affected boilers B-1 and B-3 shall not cause sulfur dioxide emissions to exceed 0.46 kg of sulfur dioxide

per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu). [35 IAC 214.161(b)]

f. Startup Provisions

The Permittee is authorized to operate an affected boiler in violation of the applicable limit of 35 IAC 216.121 during startup, pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups. This authorization is subject to the following:

- i. This authorization only extends for a period of up to 1 hour following the startup of the boiler, when the 200 ppm limit of CO could be exceeded.
- ii. The Permittee shall take the following measures to minimize startup emissions, the duration of startups, and minimize the frequency of startups:
 - A. Implementation of established manufacturers startup procedures.
- iii. The Permittee shall fulfill the applicable recordkeeping requirements of Condition 7.2.9(e).

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected boilers are not subject to NSPS, 40 CFR 60 Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units, since each steam generating unit was constructed, modified, or reconstructed prior to June 9, 1989 which is the applicability date.
- b. The affected boilers are not subject to 35 IAC 217.141, Existing Emission Sources in Major Metropolitan Areas, since the actual heat input of the boilers is less than 73.2 MW (250 MBtu/hr).

- c. The affected boilers are not subject to 35 IAC 215.301, Use of Organic Material, pursuant to 35 IAC 215.303, Fuel Combustion Emission Sources, which excludes the affected boilers from this requirement.

7.2.5 Operational and Production Limits and Work Practices

N/A

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the boilers are subject to the following:

N/A

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas usage for the affected boilers (mmscf/mo and mmscf/yr) (Note mm = 1,000,000)
- b. Fuel oil usage for affected boilers B-1 and B-3 (gal/mo and gal/yr).
- c. Each individual pollutant emission of NO_x, CO, PM, SO₂, and VOM from the affected boilers (ton/mo and ton/yr) when fired with natural gas.
- d. Each individual pollutant emission of NO_x, CO, PM, SO₂, and VOM from affected boilers B-1 and B-3

(ton/mo and ton/yr) when fired by distillate fuel oil.

e. Records for Startup

The Permittee shall maintain the following records, pursuant to Section 39.5(7)(b) of the Act, for each affected boiler subject to Condition 7.2.3(f), which at a minimum shall include:

- i. The following information for each startup of the affected boilers:
 - A. Date and duration of the startup, i.e., start time and time normal operation achieved, i.e., amount of time required to bring boiler up to normal operating temperature.
 - B. If normal operation was not achieved within 1 hour, an explanation why startup could not be achieved within this duration of time;
 - C. A detailed description of the startup, including reason for operation;
 - D. An explanation why established startup procedures could not be performed, if not performed;
 - E. Whether exceedance of Condition 5.2.2 may have occurred during startup, with explanation and estimated duration (minutes).

7.2.10 Reporting Requirements

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
 [Section 39.5(7)(f)(ii) of the Act].

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.2.12 Compliance Procedures

- a. Compliance with Conditions 7.2.3(c) and 7.2.3(d) is considered to be assured by the normal work practices and maintenance activities inherent in operation of the affected boilers, so that no compliance procedures are set in this permit addressing this requirement.
- b. Compliance with Condition 7.2.3(b) and 7.2.3(e) is demonstrated under inherent operating conditions of an affected boiler, so that no compliance procedures are set in this permit addressing this requirement.
- c. Compliance with Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formula listed below:
 - i. To determine compliance with Condition 5.5.1, emissions from the affected boilers burning natural gas shall be calculated based on the following emission factors and the formula below:

NO _x (Lb/mmscf)	CO (Lb/mmscf)	PM (Lb/mmscf)	SO ₂ (Lb/mmscf)	VOM (Lb/mmscf)
120	150	10	1	16

The above emission factors are manufacturers specifications provided in the Title V permit application.

$$\text{Gas Boiler Emissions (tons)} = [(\text{Natural Gas consumed, mmscf}) \times (\text{The appropriate emission factor, Lb/mmscf})] / 2000 \text{ Lb/ton}$$

- ii. To determine compliance with Condition 5.5.1, emissions from affected boilers B-1 and B-3 burning distillate fuel oil shall be

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calculated based on the following emission factors and formula below:

NO _x (Lb/mmBtu)	CO (Lb/mmBtu)	PM (Lb/mmBtu)	SO ₂ (Lb/mmBtu)	VOM (Lb/mmBtu)
0.25	0.07	0.025	0.515	0.025

The above emission factors are manufacturers emission specifications provided in the Title V permit application.

Typical heat content of the fuel oil is .141800 mmBtu/gal.

Oil Boiler Emissions (tons/mo) = [(Oil consumed,gal/mo) x (appropriate emission factor, Lb/mmBTU) x (.141800 mmBtu/gal)]/2000 Lb/ton

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____ **{insert public notice start date}** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

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- i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153
 - iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506
 - iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or

denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment A Summary of Process Weight Rate
 35 IAC 212.321

Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:
 Emissions Equation

where:

P = Process weight rate; and
 E = Allowable emission rate; and,

a. Up to process weight rates of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

b. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40

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Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.15
4.5	2.7	5.00	6.00
9.	3.9	10.00	8.70
13.	4.8	15.00	10.80
18.	5.7	20.00	12.50
23.	6.5	25.00	14.00
27.	7.1	30.00	15.60
32.	7.7	35.00	17.00
36.	8.2	40.00	18.20
41.	8.8	45.00	19.20
45.	9.3	50.00	20.50
90.	13.4	100.00	29.50
140.	17.0	150.00	37.00
180.	19.4	200.00	43.00
230.	22.	250.00	48.50
270.	24.	300.00	53.00
320.	26.	350.00	58.00
360.	28.	400.00	62.00
408.	30.1	450.00	66.00
454.	30.4	500.00	67.00

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10.2 Attachment 2 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

MJK:psj