

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

**BUREAU OF AIR**

**DIVISION of AIR POLLUTION CONTROL**

**PERMIT SECTION**

PROJECT SUMMARY for the  
PROPOSED TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

International Paper Foodservice Business  
500 Dacey Drive  
Shelbyville, Illinois 62565

Permit Engineer/Technical Contact: Jonathan Sperry, 217/782-2113

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Springfield, Illinois

## I. INTRODUCTION

This source has applied for an initial Title V - Clean Air Act Permit Program (CAAPP) operating permit (I.D. 173030AAP, Permit #04090011) for its existing operation. The CAAPP is the program established in Illinois for operating permits for significant stationary sources as required by the federal Clean Air Act, as amended in 1990, and 40 CFR Part 70. Unlike state operating permits, the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA. This document is for informational purposes only and does not shield the Permittee from enforcement actions or its responsibility to comply with applicable regulations. This document shall not constitute a defense to a violation of the Act or any rule or regulation.

A Title V permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits, appropriate compliance procedures, and specific operational flexibility. The appropriate compliance procedures may include monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

## II. SOURCE DESCRIPTION INFORMATION

### a. Location and nature of business

The source manufactures paper cups and tubs and polystyrene cups and lids. In addition, the source operates a boiler and heaters to provide steam and comfort heating.

### b. National Ambient Air Quality Standard status for this area

This source is located in an area that is in attainment of the National Ambient Air Quality Standards for all pollutants.

### c. Major source status

The proposed permit is based on:

1. The source requiring a CAAPP permit as a major source of HAP emissions.
2. The source requiring a CAAPP permit because the source is subject to a standard, limitation, or other requirement under Section 111 (NSPS) or Section 112 (HAPs) of the CAA for which USEPA requires a CAAPP

permit, or because the source is in a source category designated by the USEPA (see Condition 5.2 of the proposed permit).

d. Significant emission units

Emission Unit	Description	Date Constructed	Emission Control Equipment
B-1	Boiler (20.9 mmBtu/hr)	Jan. 1974	None
H-1, H-2, H-3	Space Heaters (3 at 5.0 mmBtu/hr)	April 1996	None
S-1 through S-10	Storage Silos	1992-2001	Silo Filters (SF-1 through SF-10)
PE-1, FT-1, FT-2	Paper/Plastic Extruder with Flame Treaters (2 at 1.6 mmBtu/hr)	Feb. 1988	None
COR-1, COR-2	Corona Arc Treaters	Nov. 2002 and Dec. 2003	Ozone Decomposition Units (OZONE-1, OZONE-2)
FP-1 through FP-7	Flexographic Printing Presses with Dryers (8.28 mmBtu/hr Total)	1974-1998	None
PM-1	Plate Maker	Oct. 2000	None
TUB-1	7 Tub Gluing Lines	Jan. 1987	None
LAM-1	Laminator	Jan. 1991	None
SHRED-1, BAL-1, BAL-2	Waste Paper Collection System Shredder and Balers	2002 (Cyclones C-3 and C-4: 1985)	Cyclones C-1 through C-4
PS-1 through PS-15, PS-18 through PS-22, Cono-Clip Line, Cup Line	22 Polystyrene Extrusion Machines	1979-1987 (PS-21: 2000, Cup Line: 2001, PS-22: 2004)	Electrostatic Precipitator
GR-1 through GR-29	Polystyrene Grinders	1979-2004	Bag Filters (BF-1 through BF-29)
UV-1, UV-2, UV-3	UV Offset Printing Presses	Jan. 2001 and Nov. 2001	None

## III. EMISSIONS INFORMATION

The proposed permit limits the source wide maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source-wide limit. Further unit specific emission unit limitations are found within Sections 5 and 7 of the proposed permit.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	89.71
Sulfur Dioxide (SO <sub>2</sub> )	0.12
Particulate Matter (PM)	64.20
Nitrogen Oxides (NO <sub>x</sub> )	20.75
Hazardous Air pollutant (HAP), not included in VOM or PM	9.59
Total	184.37

This proposed permit contains terms and conditions that address the applicability, and, if determined applicable, substantive requirements of Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the proposed permit by T1, T1R, or T1N. Any conditions established in a construction permit [T1] pursuant to Title I and not revised or deleted in this proposed permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them. Where the source has requested that the Illinois EPA establish new [T1N] or revise [T1R] such conditions in a Title I permit, those conditions are consistent with the information provided in the Title V application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

This proposed permit does establish newly revised [T1R] requirements.

#### IV. EMISSIONS CONTROL PROGRAMS INFORMATION

As of the date of issuance of this permit, there are no such emissions control programs applicable to this source.

#### V. COMPLIANCE ASSURANCE MONITORING (CAM) PLAN INFORMATION

The Compliance Assurance Monitoring (CAM) plan is a program for pollutant-specific emission units which use an add-on control device to achieve compliance with an emission limitation or standard, has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than major source threshold levels, and is not specifically exempt by 40 CFR Part 64. There are no specific emission units that require a CAM plan at this time, as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

The storage silos are subject to 40 CFR Part 64, but the Permittee is not required to submit a CAM plan until the Permittee submits a renewal application for this permit. This is because the storage silos are not large pollutant specific emission units, as defined in 40 CFR 64.5(a).

## VI. OTHER PERTINENT INFORMATION

### a. Risk Management Plan (RMP)

A risk management plan (RMP) is a program required for a source affected by Chemical Accident Prevention for reducing the levels of emissions during an emergency, consistent with safe operating procedures. If the Permittee becomes subject to the RMP then the Permittee would be required to immediately implement the appropriate steps described in this plan should an emergency be declared. The Permittee then would be required to maintain and have this plan on file with the Illinois EPA.

### b. Episode Action Plan (EAP)

An episode action plan (EAP) is a program for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Permittee is required to immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared. The Permittee is required to maintain and have this plan on file with the Illinois EPA. An approved plan is currently on file with the Illinois EPA.

## VII. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source.

## VIII. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a Title V permit. The Illinois EPA is therefore proposing to issue a Title V permit, subject to the conditions proposed in the draft permit.

Comments are requested by the Illinois EPA for the proposed permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.