

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Field Container Company  
Attn: James L. Seefeldt  
1500 Nicholas Boulevard  
Elk Grove Village, Illinois 60007

Application No.: 00050014

I.D. No.: 031440AJZ

Applicant's Designation: CYOGLUERS

Date Received: May 5, 2000

Subject: Replacement Gluers, Press

Date Issued: June 29, 2000

Location: 1500 Nicholas Boulevard, Elk Grove Village

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of three new gluers and two sheetfed non-heatset lithographic printing presses as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.0 Unit Specific Conditions

1.1 Unit Gluers  
Control None

1.1.1 Description

The three new gluers apply adhesive to cartons to make folding cartons. The adhesive is water-based and contains a small amount of volatile organic material (about 2 percent by weight).

1.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Domino #44003 and Speed Queen #44004	2 Gluers	None
Gluer #8	1 Gluer	None

1.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected gluer" for the purpose of these unit-specific conditions, is each gluer as described in conditions 1.1.1 and 1.1.2.

- b. Each affected gluer is subject to 35 IAC 212.321(a), which provides that 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, 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 subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- c. Each affected gluer is subject to the following limitation:
  - i. No owner or operator of an affected gluer shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the paper coating as applied pursuant to 35 IAC 218.204(c). The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>kg/l</u>	<u>lb/gal</u>
0.28	2.3
  - ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

1.1.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected gluers not being subject to 35 IAC 218, Subpart G, because the affected gluers are required to meet 35 IAC 218.204(c) [35 IAC 218.209].

1.1.5 Operational and Production Limits and Work Practices

None

1.1.6 Emission Limitations

The affected gluers are subject to the following:

- a. Emissions from the affected gluers shall not exceed the following limits:

<u>Item of Equipment</u>	<u>VOM Emissions</u>	
	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Domino #44003 & Speed Queen #44004	117	0.4
Gluer #8	58	0.2

These limits are based on the maximum coating usage and the maximum VOM content of the coating.

- b. 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).
- c. The source has addressed the applicability and compliance of 35 IAC Part 203, Major Stationary Sources Construction and Modification (See Attachment 1). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules.

1.1.7 Testing Requirements

- a. The VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 to establish the records required under 35 IAC 218.211 [35 IAC 218.211(a)].
- b. The testing required by Condition 1.1.7(a) may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 1.1.9 directly reflect the application of such material and separately account for any additions of solvent.

1.1.8 Monitoring Requirements

None

1.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected gluers to demonstrate compliance with conditions 1.1.3 and 1.1.6:

- a. The owner or operator of an affected gluer shall collect and record all of the following information each day for each affected gluer and maintain the information at the source for a period of three years [35 IAC 218.211(c)(2)]:
  - i. The name and identification number of each coating as applied on each affected gluer; and
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each affected gluer.
- b. Volume of each coating used (gallons).

#### 1.1.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the affected gluers with the permit requirements as follows. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions of VOM in excess of the limits specified in Condition 1.1.6.
- b. Any record showing violation of 35 IAC 218.204(c) shall be reported by sending a copy of such record to the Agency within 30 days following the occurrence of the violation.
- c. At least 30 calendar days before changing the method of compliance from 35 IAC 218.204 to 35 IAC 218.205 35 IAC 218.207, the owner or operator shall comply with all requirements of 35 IAC 218.211(d)(1) or (e)(1), respectively. Upon changing the method of compliance from 35 IAC 218.204 to 35 IAC 218.205 or 35 IAC 218.207, the owner or operator shall comply with all requirements of 35 IAC 218.211(d) or (e), respectively.

#### 1.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected gluer 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:

- a. Usage of coatings, cleaning solvents or other raw materials at this source with various VOM contents provided that the materials are tested in accordance with Condition 1.1.7 and the limits specified in Condition 1.1.6 are not exceeded and the affected gluers remain in compliance with Condition 1.1.3.
- b. Activities involving routine repair, replacement of parts, general maintenance, replacement of equipment and physical relocation of equipment on-site provided the emission limitations in Condition 1.1.6 are not exceeded and the affected gluers remain in compliance with 1.1.3.

1.1.12 Compliance Procedures

- a. Compliance with Condition 1.1.3(b) is assumed to be achieved by the work-practices inherent in operation of an affected gluer.
- b. Compliance with the emission limits established in condition 1.1.6 shall be based on the recordkeeping requirements in Condition 1.1.9 and the emission factors and formulas listed below:

To determine compliance with Condition 1.1.6, VOM emissions from the affected gluers shall be calculated based on the following:

$$\text{VOM Emissions (tons)} = (\text{Material Usage, gallons}) \times (\text{VOM Content of Material, lb VOM/gallon})$$

1.2 Unit: Sheetfed Non-heatset Lithographic Printing Presses  
Control: None

1.2.1 Description

Paperboard is fed to the printing presses where ink and/or coating may be applied to the substrate sheet.

1.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Press #17	Sheetfed Non-heatset Lithographic Printing Press	None
Stand-In Press	Sheetfed Non-heatset Lithographic Printing Press	None

1.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected printing line" for the purpose of these unit-specific conditions, is each printing line as described in Conditions 1.2.1 and 1.2.2.
- b. Each affected printing line is subject to limitations of 35 IAC 218.407(a)(3) for as-applied fountain solution, which provides that:
  - No owner or operator of any sheetfed offset lithographic printing line shall apply fountain solution with the VOM content exceeding the following limits:
    - i. 5 percent, by volume; or
    - ii. 8.5 percent, by volume, and the temperature of the fountain solution is maintained below 15.6EC (60EF), measured at the reservoir or the fountain tray.
- c. Each affected printing line is subject to limitations of 35 IAC 218.407(a)(4) for as-used cleaning solution, which provides that:
  - No owner or operator of any lithographic printing line shall apply the as-used cleaning solution with VOM content or VOM composite partial vapor pressure equal to or exceeding the following limits:
    - i. 30 percent of VOM content by weight; or
    - ii. 10 mmHg at 20EC (68EF).
- d. Each affected printing line at the source is subject to requirements of 35 IAC 218.407(a)(5) for keeping cleaning materials, which provides that:

The VOM containing cleaning materials, including used cleaning towels associated with any lithographic printing line shall be kept, stored and disposed of in closed containers.

1.2.4 Non-Applicability of Regulations of Concern

This permit is issued based on each affected printing line not being subject to 35 IAC 218.204(c), because each affected printing line is not required to comply with the paper coating limitations in 35 IAC 218.204(c) if the it complies with the emission limitations in 35 IAC Part 218, Subpart H: Printing and Publishing.

1.2.5 Operational and Production Limits and Work Practices

None

1.2.6 Emission Limitations

The affected printing lines are subject to the following:

- a. Emissions from Press #17 shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.88	6.0

These limits are based on the maximum material usage and the maximum material VOM content.

- b. i. Emissions from the stand-in press shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.6	4.1

These limits are based on the maximum material usage and the maximum VOM content.

- ii. Emissions from existing presses 106R, 107, 108 and 109 and from the new stand-in press shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
2.69	18.39

These limits are based on the maximum material usage, the maximum VOM content and the compliance procedures listed in Condition 1.2.12. The annual limits is based on the two year baseline emissions for the four existing presses.

- c. 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).
- d. The source has addressed the applicability and compliance of 35 IAC Part 203, Major Stationary Sources Construction and Modification (See Attachment 1). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules.

1.2.7 Testing Requirements

- a. Testing to demonstrate compliance with the requirements of Section 218.407 of this Subpart shall be conducted by the owner or operator within 90 days after a request by the Agency. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Agency in writing 30 days in advance of conducting such testing to allow the Agency to be present during such testing.
- b. Testing to demonstrate compliance with the VOM content limitations in 35 IAC 218.407(a)(3) and (a)(4)(A) shall be conducted upon request of the Agency, as follows:
  - i. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used; provided, however, Method 24, incorporated by reference at 35 IAC 218.112, shall be used to demonstrate compliance; or

- ii. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a); provided, however, Method 24 shall be used to determine compliance.
- c. Testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 IAC 218.110.

#### 1.2.8 Monitoring Requirements

##### a. Fountain Solution Temperature.

- i. The owner or operator of any lithographic printing line relying on the temperature of the fountain solution shall install, maintain, and continuously operate a temperature monitor of the fountain solution in the reservoir or fountain tray, as applicable [35 IAC 218.410(a)(1)].
- ii. The temperature monitor must be capable of reading with an accuracy of 0.3EC or 0.5EF, and must be attached to an automatic, continuous recording device such as a strip chart, recorder, or computer, with at least the same accuracy, that is installed, calibrated and maintained in accordance with the manufacturer's specifications. If the automatic, continuous recording device malfunctions, the owner or operator shall record the temperature of the fountain solution at least once every two operating hours. The automatic, continuous recording device shall be repaired or replaced as soon as practicable [35 IAC 218.410(a)(2)].

##### b. Fountain Solution VOM Content.

- i. For a fountain solution to which VOM is not added automatically:

- A. Maintain records of the VOM content of the fountain solution; or
- B. Take a sample of the as-applied fountain solution from the fountain tray or reservoir, as applicable, each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution in the fountain tray or reservoir, and shall determine compliance with the VOM content limitation of the as-applied fountain solution by using one of the following options:
  - I. With a refractometer or hydrometer with a visual, analog, or digital readout and with an accuracy of 0.5 percent. The refractometer or hydrometer must be calibrated with a standard solution for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications, against measurements performed to determine compliance. The refractometer or hydrometer must be corrected for temperature at least once per 8-hour shift or once per batch of fountain solution prepared or modified, whichever is longer; or
  - II. With a conductivity meter if it is demonstrated that a refractometer and hydrometer cannot distinguish between compliant and noncompliant fountain solution for the type and amount of VOM in the fountain solution. A source may use a conductivity meter if it demonstrates that both hydrometers and refractometers fail to provide significantly different measurements for standard solutions containing 95 percent, 100 percent and 105 percent of the applicable VOM content limit. The conductivity meter reading for the fountain solution must be referenced to the conductivity of

the incoming water. A standard solution shall be used to calibrate the conductivity meter for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications;

- ii. For fountain solutions to which VOM is added at the source with automatic feed equipment, determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level. The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications.

c. Cleaning Solution

- i. The owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution must:
  - A. For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM materials):
    - I. Install, operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM materials), as mixed; and
    - II. Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM materials), as applied, comply with Condition 1.2.3.
  - B. For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM materials).

- ii. The owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with 35 IAC 218.407(a)(4)(B) must keep records for such cleaning solutions used on any such line(s) as set forth in 35 IAC 218.411(d)(2)(C).

#### 1.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected printing lines to demonstrate compliance with conditions of this permit:

##### a. Fountain Solution

- i. The name and identification of each batch of fountain solution prepared for use on one or more lithographic printing lines, the lithographic printing line(s) or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch;
- ii. If an owner or operator uses a hydrometer, refractometer, or conductivity meter, pursuant to 35 IAC 218.410(b)(1)(B), to demonstrate compliance with the applicable VOM content limit in 35 IAC 218.407(a)(1)(A), (a)(2), or (a)(3):
  - A. The date and time of preparation, and each subsequent modification, of the batch;
  - B. The results of each measurement taken in accordance with 35 IAC 218.410(b);
  - C. Documentation of the periodic calibration of the meter in accordance with the manufacturer's specifications, including date and time of calibration, personnel conducting, identity of standard solution, and resultant reading; and
  - D. Documentation of the periodic temperature adjustment of the meter, including date and time of adjustment, personnel conducting and results;

- iii. If the VOM content of the fountain solution is determined pursuant to 35 IAC 218.410(b)(1)(A), for each batch of as-applied fountain solution:
    - A. Date and time of preparation and each subsequent modification of the batch;
    - B. Volume and VOM content of each component used in, or subsequently added to, the fountain solution batch;
    - C. Calculated VOM content of the as-applied fountain solution; and
  - iv. If the owner or operator relies on the temperature of the fountain solution to comply with the requirements in 35 IAC 218.407(a)(1)(A)(ii) or (a)(3)(B):
    - A. The temperature of the fountain solution at each printing line, as monitored in accordance with 35 IAC 218.410(a); and
    - B. A maintenance log for the temperature monitoring devices and automatic, continuous temperature recorders detailing all routine and non-routine maintenance performed, including dates and duration of any outages;
- b. Cleaning Solution
- i. For each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 IAC 218.407(a)(4)(A) and which is prepared at the source with automatic equipment:
    - A. The name and identification of each cleaning solution;
    - B. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with Section 218.409(c) of this Subpart;

- C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
  - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
  - E. The VOM content of the as-used cleaning solution, with supporting calculations; and
  - F. A calibration log for the automatic equipment, detailing periodic checks;
- ii. For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 IAC 218.407(a)(4)(A), and which is not prepared at the source with automatic equipment:
- A. The name and identification of each cleaning solution;
  - B. Date and time of preparation, and each subsequent modification, of the batch;
  - C. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 IAC 218.409(c);
  - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
  - E. The VOM content of the as-used cleaning solution, with supporting calculations;
- iii. For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with 35 IAC 218.407(a)(4)(B):

- A. The name and identification of each cleaning solution;
  - B. Date and time of preparation, and each subsequent modification, of the batch;
  - C. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with 35 IAC 218.409(e);
  - D. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
  - E. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with 35 IAC 218.409(e);
- iv. The date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any;
- c. The Permittee shall collect and record the following information for the affected printing lines:
- i. Monthly and annual VOM usage separately for the affected printing line, in terms of pounds;
  - ii. The VOM content of each ink, coating, fountain solution, and cleaning solution used, accompanied by a copy of the supporting information, e.g., supplier data sheet or laboratory analysis reports; and
  - iii. Total emissions of VOM from all affected lithographic printing lines calculated in accordance with procedures given in Condition 1.2.12 for the current plus the preceding 11 months.

1.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows:

a. Report of Deviations

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.

b. Report for Changing Method of Compliance

i. If changing its method of demonstrating compliance with the applicable VOM content limitations in 35 IAC 218.407, or changing the method of demonstrating compliance with the VOM content limitations for fountain solutions pursuant to 35 IAC 218.409, certify compliance for such new method(s) in accordance with 35 IAC 218.411(c)(1) within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing line(s) will be in compliance with the applicable requirements of 35 IAC 218.407 [35 IAC 218.411(c)(4)].

ii. If changing its method of demonstrating compliance with the requirements of 35 IAC 218.407(a)(4), or changing between automatic and manual methods of preparing cleaning solutions, certify compliance for such new method in accordance with 35 IAC 218.411(d)(1), within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing line(s) will be in compliance with the applicable requirements of 35 IAC 218.407(a)(4) [35 IAC 218.411(d)(4)].

1.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational changes with respect to an affected printing line without prior to notification 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:

- a. Usage of coatings, ink, fountain solution, cleaning solvents, or other raw materials at this source with various VOM contents provided that the materials are tested in accordance with Condition 1.2.7 and the limits specified in Condition 1.2.6 are not exceeded and an affected printing line remains in compliance with Condition 1.2.3.
- b. Activities involving routine repair, replacement of parts, general maintenance, replacement of equipment and physical relocation of equipment on-site provided the emission limitations in Condition 1.2.6 are not exceeded and the affected printing line remains in compliance with 1.2.3.

1.2.12 Compliance Procedures

- a. Compliance for the affected printing lines with VOM emission limitations in Condition 1.2.3 shall be based on the recordkeeping requirements in Condition 1.2.9.
- b. Compliance with annual VOM emission limits in Condition 1.2.6 from the affected lithographic printing lines shall be determined by using the emission factors and formulas listed below:
  - i. The Permittee may presume 95% retention of coldset ink VOM in substrate, as stated in 35 IAC 218.411(a)(1)(B)(iii);
  - ii. The Permittee may presume 50% retention of the manual blanket wash VOM in the cleaning towels;
  - iii.  $VOM \text{ Emissions from Ink Usage} = VOM \text{ Ink Usage} \times 0.05 - VOM \text{ Ink Waste}$

- iv. VOM Emissions from Fountain Solution = VOM Fountain Solution Usage - VOM Fountain Solution Waste
  - v. VOM Emissions from the Manual Cleaning Solution (Manual Blanket Wash) = Manual Cleaning Solution VOM Usage x 0.5
  - vi. VOM Emissions from the Automatic Blanket Wash = Automatic Blanket Wash VOM Usage - Automatic Blanket Wash Waste
  - vii. Total VOM Emissions = Ink VOM Emissions + Fountain Solution VOM Emissions + Cleaning Solution VOM Emissions (Manual Blanket Wash VOM Emissions + Automatic Blanket Wash VOM Emissions) + Coating VOM Emissions
2. Each affected printing line and each affected gluer may be operated for a period of 180 days under this construction permit.
- 3a. Emissions of volatile organic material from press 50 shall not exceed 0.66 tons/month and 4.5 tons/year. Compliance with the annual limit shall be determined from a running total of 12 months of data.
- b. Emissions of volatile organic material from the Jagenberg gluer shall not exceed 0.02 tons/month and 0.1 tons/year. Compliance with the annual limit shall be determined from a running total of 12 months of data.
4. This permit is issued based on the shutdown of the two gluers and three presses (see Attachment 1) prior to operation of the new sheetfed press and three new gluers.

Please note that the Permittee should seek to amend their CAAPP permit to include the construction and/or modification covered under this permit through the administrative amendment process by submitting an application that includes the information contained in form 273-CAAPP. This application must also identify and address any changes from the associated construction permit application. Note that information previously submitted in the construction permit application may be incorporated by reference into the application to amend the CAAPP permit. The Permittee must also provide updated information on fees as contained in form 292-CAAPP, "Fee Determination for CAAPP Permit."

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

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

DES:JMS:psj

cc: Region 1

Attachment 1

NSR Applicability

Contemporaneous Time Period of 1996 Through 2000

**Table I - Emissions Increases Associated With The Proposed Modification**

<u>Item of Equipment</u>	<u>Proposed Commencement of Operation Date</u>	<u>Permitted VOM Emissions (Tons/Year)</u>
Stand-In Press	2000	0.00
Sheetfed Press	2000	6.00
Three Gluers	2000	<u>0.60</u>
		6.60

**Table II - Source-Wide Creditable Contemporaneous Emission Decreases**

<u>Item of Equipment</u>	<u>Removal Date</u>	<u>VOM* Emissions (Tons/Year)</u>
Press 28	1999	2.70
Press 106	1998	1.60
Two Gluers	2000	0.03
Three Presses	2000	<u>8.79</u>
		13.12

**Table III - Source-Wide Creditable Contemporaneous Emission Increases**

<u>Item of Equipment</u>	<u>Operational Date</u>	<u>Permitted VOM Emissions (Tons/Year)</u>
Press 55	1996	4.50
Press 10R & 13R	1999	11.90
Press 106R	1999	7.30
Jagenberg Gluer	1996	<u>0.10</u>
		23.80

**Table IV - Net Emissions Change**

	<u>(Tons/Year)</u>
Increases Associated With The Proposed Modification	6.60
Creditable Contemporaneous Emission Decreases	-13.12
Creditable Contemporaneous Emission Increases	<u>23.80</u>
	17.28

\* Past actual emissions are based on an average of the actual emissions from the previous two calendar years prior to shutdown of equipment.