

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
UPM Raflatac, Inc. for a  
Federally Enforceable State Operating Permit (FESOP) for  
101 East Corporate Drive  
Dixon, Illinois 61021

Site Identification No.: 103020ACN  
Application No.: 10010007

Illinois EPA Contacts  
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## **I. INTRODUCTION**

UPM Raflatac Incorporated has applied for a Federally Enforceable State Operating Permit (FESOP) for its pressure sensitive labelstock manufacturing facility at 101 East Corporate Drive in Dixon. This facility requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the permit that it would propose to issue for the plant. However, before issuing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

## **II. SOURCE DESCRIPTION**

UPM Raflatac Incorporated operates a pressure sensitive labelstock manufacturing facility. Regulated emission units at the facility include one coating line and multiple above ground storage tanks containing water-based adhesives and adhesive raw materials. Labelstock is composed of a liner sheet, silicone release coating, adhesive, and a face sheet. Jumbo rolls of labelstock are produced on the coating line. The jumbo rolls are slit to specified widths and lengths to fill customer orders. No label printing operations are conducted at the facility. The facility currently utilizes odorless mineral spirits, ethyl acetate, and citrus cleaners to remove adhesives and silicones.

The coatings and solvents contain organic solvents which are emitted to the atmosphere during the coating process as volatile organic material (VOM). These materials also may contain components that are considered hazardous air pollutants (HAPs).

## **III. GENERAL DISCUSSION**

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has been operating this plant under a lifetime state operating permit because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, the source is planning on increasing production and now is requesting a FESOP

permit. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

#### **IV. APPLICABLE EMISSION STANDARDS**

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The Illinois Pollution Control Board has specific standards for units emitting volatile organic material. The specific standard for this company is 35 Ill., Adm. Code 215 Subpart F Regulations for Coating Operations. These regulations limit the amount of VOM that may be in the coatings used. There is also a New Souce Performance Standard for pressure sensitive Tape and label surface coating, 40 CFR 60, subpart RR. Subpart RR requires that the material limit is 0.20 kg VOC/kg of coating solids. This source has emission limits in its permit that keep the amount of hazardous air pollutants below major levels therefore the NESHAP regulations do not apply. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

#### **V. CONTENTS OF THE PERMIT**

This permit that the Illinois EPA is proposing to issue will identify the specific emission standards that apply to the emission units at the plant. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit conditions require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated

within the limitations set by the permit and the plant's emissions are being properly controlled.

**VI. REQUEST FOR COMMENTS**

It is the Illinois EPA's preliminary determination that the source has met the requirements for issuance of its permit. The Illinois EPA is therefore proposing to issue the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.