

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Bag Makers, Inc. for Revision of the
Federally Enforceable State Operating Permit (FESOP) for
6606 South Union Road
Union, Illinois

Site Identification No.: 111804AAD

Application No.: 03070014

Schedule

Public Comment Period Begins: May 2, 2012

Public Comment Period Closes: June 1, 2012

Illinois EPA Contacts

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I. INTRODUCTION

Bag Makers, Inc. currently operates under federally enforceable state operating permit (FESOP) which was issued five years ago. The company requested a renewal of their FESOP to continue to operate as non-major source for the purposes of the Clean Air Act Permit Program (CAAPP). This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed 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

Bag Makers, Inc. is packaging products printing plant. The emission units at this plant that require an operating permit include twenty-one flexographic and thirty-three screen printing presses. These units are sources of emissions because the printing inks and cleaning solutions contain organic solvents, which are emitted to the atmosphere during the printing process as volatile organic material (VOM). The solvents also contain components that are considered hazardous air pollutants (HAPs)). The heat for plant operations is provided by by natural gas-fired heaters and dryers.

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 FESOP 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 Clean Air Act and regulations promulgated thereunder. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source for this program. 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 federally enforceable limitations of the annual potential and seasonal VOM emissions also allow the source to avoid applicability of control requirements of 35 Ill. Adm. Code Part 218, Subpart H – Printing and Publishing to its flexographic printing operations and participation in the Emissions Reduction Market System (ERMS).

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 and VOM emissions during a seasonal allotment period from May 1 through September 30 to less than 15 tons.

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 board has specific standards for units emitting volatile organic material in the Greater Chicago area, e.g., 35 IAC, Part 218, Subpart H – Printing and Publishing. The source is exempted from the requirements of this subpart due to FESOP limitations of the potential VOM emission to the the below subpart applicability level.

The source potentially could be subject to the 40 CFR 63, Subpart KK— National Emission Standards for the Printing and Publishing Industry. The source is exempted from the requirements of this subpart due to FESOP limitations of the potential emissions of HAPs to below major source threshold level.

The silk screen printing operations are subject to 35 IAC, Part 218, Subpart TT requirements but are exempt from control requirements of Subpart TT due to limiting VOM emission from all silk screen presses to less than 5 tons/year.

The source VOM emissions are subject to the general VOM emission limitation found in 35 IAC 218.301 – Use of Organic Material.

The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

The revised permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant. As explained, the printing presses are subject to 35 IAC 218.301, which restricts VOM emissions from any emission unit to less than 8 lb/hr. 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 would also set limitations on the seasonal allotment period VOM emission. These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions would also continue to 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 renewal of its permit. The Illinois EPA is therefore proposing to renew 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.