

217/782-2113

REVISED  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT-(NESHAP)

PERMITTEE

Georgia Pacific Corrugated II LLC  
Attn: Walter Reinhardt  
440 East 138th Street  
Chicago, IL 60827

<u>Application No.:</u> 72120453	<u>I.D. No.:</u> 031600BQB
<u>Applicant's Designation:</u> FESOP	<u>Date Received:</u> March 3, 2006
<u>Subject:</u> Box Plant	
<u>Date Issued:</u> May 17, 2010	<u>Expiration Date:</u> November 6, 2011
<u>Location:</u> 440 East 138th Street, Chicago, 60627	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a box plant (2 gas-fired boilers, 1 scrap paper separator with a cyclone, 1 starch silo with a baghouse, 4 flexo-folder gluers and 3 die cutters (flexo printing)) pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
  - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for VOM, 10 tons/year for a single HAP, and 25 tons/year for a combination of HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
  - ii. To limit the emissions of volatile organic material from the source to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to initial issuance of a FESOP to this source, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. The wide-web flexographic printing is subject to a National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Air Pollutants (HAP) emissions from the printing operations, 40 CFR 63, Subparts A and KK. The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

- 3a. This permit is based on the source meeting the criteria for an area source (i.e. less than 10 tons per year of individual HAP and 25 tons per year of combined HAP for each rolling 12-month period).
- b. The Permittee shall meet the recordkeeping requirements in 40 CFR 63.829(d) and this permit to demonstrate the area source status.
- c. The Permittee shall meet the reporting requirements in 40 CFR 63.830(b)(1) and 63.9(b).
- 4a. The 24.5-mmBtu/hour natural-gas-fired boiler is subject to the New Source Performance Standard (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart A and Dc. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. The Permittee shall fulfill applicable notification and recordkeeping requirements, pursuant to 40 CFR 60.7 and 40 CFR 60.48.
- c. At all times, the Permittee shall maintain and operate the boiler in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to 40 CFR 60.11(d).
- 6. This permit is issued based upon the source being subject to the VOM control requirements of 35 Ill. Adm. Code 218, Subpart H: "Flexographic and Rotogravure Printing". The Permittee shall meet 35 Ill. Adm. Code 218.401(a) by not applying flexographic coatings or inks which exceed the following:
  - a. 40% VOM by volume of the coating and ink (minus water and any other exempt compounds from VOM), or
  - b. 25% VOM by volume of the volatile content of the coating and ink.
- 7. Emissions and operation of all printing and gluing operations shall not exceed the following limits:

Emission Unit	VOM* Usage		VOM* Emissions	
	(Tons/Mo)	(Tons/Yr)	(Tons/Mo)	(Tons/Yr)
Presses including any Cleanup and Other Solvents	1.9	19.0	1.9	19.0

\* Volatile Organic Material

These limits are based on material usage and the VOM content. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 8. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the

emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

9. Emissions and operation from all natural gas combustion shall not exceed the following limits:

Natural Gas Firing Rate		E M I S S I O N S		Carbon Monoxide	
<u>(mmscf/Month)</u>	<u>(mmscf/Year)</u>	<u>Nitrogen Oxides</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>
35.3	352.8	1.77	17.64	1.48	14.82

  

Particulate Matter		E M I S S I O N S		Sulfur Dioxide	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>Volatile Organic Material</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>
0.13	1.34	0.10	0.97	0.01	0.10

These limits are based on standard emission factors (AP-42, 1.4) and maximum natural gas usage. Compliance with annual limits shall be determined from a running total of 12 months of data.

10. Natural gas shall be the only fuel fired in the boilers. Use of any other fuel shall require prior approval by the Illinois EPA.
- 11a. Operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Operating Rate</u>	Particulate Matter Emissions	
		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Starch Silo	500 Tons/Mo & 6,000 Tons/Yr	0.01	0.12
Scrap Paper Separator	2 Tons/Hr & 17,520 Tons/Yr	1.35	16.21

- b. Compliance with annual limits shall be determined on a rolling monthly basis from the sum of the data for the current month and the preceding 11 months.
12. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
- 13a. The Permittee shall maintain monthly and annual records of the following:
- i. Names and amounts of inks, adhesives, and solvents used (gallons/month and gallons/year).
  - ii. VOM and HAP content of each ink and solvent used (lbs/gallon).
  - iii. Natural gas usage (scf/month and scf/year)
  - iv. VOM and HAP emissions for preceding month (tons/month) and preceding 12 months (tons/year).
  - v. Boiler emissions (tons/month and tons/year).

- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 14. 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.
- 15. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

Please note that this permit has been revised to correct the number of gas-fired boilers.

If you have any questions on this permit, please call Bruce Beazley at 217/782-2113.

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

ECB:BDB:jws

cc: Illinois EPA, FOS Region 1

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the box plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario, which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (100 tons/year for VOM, 10 tons/year for a single HAP, and 25 tons/year for a combination of HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

Emission Unit	Emissions in tons per year						
	NO <sub>x</sub>	CO	PM	VOM	SO <sub>2</sub>	Single HAP	Combined HAP
Gas-Fired Boiler	17.64	14.82	1.34	0.97	0.10		
Scrap Paper Separator			16.21				
Starch Silo			0.12				
Flexo-Folder Gluers and Die Cutters				19.00			
<b>Total</b>	<b>17.64</b>	<b>14.82</b>	<b>17.67</b>	<b>19.97</b>	<b>0.10</b>	<b>&lt; 10</b>	<b>&lt; 25</b>