

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
1021 N. Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

Project Summary for an Application from
Caraustar Chicago Carton for a
Federally Enforceable State Operating Permit (FESOP) for
555 North Tripp Avenue
Chicago, Illinois 60624

Site Identification No.: 031600GVT
Application No.: 08100032

Illinois EPA Contacts

Permit Analyst: David Hulskotter
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

Caraustar Chicago Carton has applied for a Federally Enforceable State Operating Permit (FESOP) for its manufacturing plant. 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 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

The company purchases paperboard stock in roll form and stores it for a short period in the warehouse. Sheets of paperboard stock are processed in one of four different non-heatset sheet-fed offset lithographic printing presses. Initially, ink is applied to sheets within individual modules. Printed sheets are then sealed with a coating. During the printing process, the fountain solution is automatically supplied to individual presses. The fountain solution wets and desensitizes the non-image area of the printing plates. This solution also lubricates plates and blankets during the printing process. The fountain solution's lubricant properties aid in reducing the wear of images and prolong the life of the plates. Additionally, the fountain solution cools the plates, helps to maintain the working properties of the ink and aids in proper blanket release which, in turn, reduces piling on the blanket. During job changeovers roller and blanket wash is automatically applied to remove ink from press components. Additionally, workers manually apply cleaning solution with rags to clean the plates and other machine parts. The inks, cleaning solution and fountain solution contain organic solvents. The principal air contaminant emitted from the facility is Volatile Organic Material (VOM), generated during the use of inks, fountain solution and cleaning solutions.

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 requires 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 federal Clean Air Act. 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. 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 not 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 Board has specific standards for units emitting Volatile Organic Material in the Greater Chicago Area. The applicable rules for lithographic printing lines are found in 35 Ill. Adm. Code 218.207. These rules require low VOM contents for fountain solution and cleaning solution. Or in place of a low VOM content for cleaning solution, low vapor pressure cleaning solutions may be used. According to 35 Ill. Adm. Code 218.407(a)(3) the as applied VOM content of the fountain solution is required to be five percent or less by volume. The cleaning solution is required to have a VOM content of 30 percent by weight or less, or the VOM composite partial vapor pressure of the cleaning solution is 10 mmHg at 20 degrees Celsius. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

V. CONTENTS OF THE PERMIT

The permit that the Illinois EPA is proposing to issue would 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 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 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.