

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for a  
Construction Permit Application from  
Printpack Inc. for  
New Rotogravure Printing Presses With Afterburner  
And Seaming Machines  
at Its Existing Facility in  
Elgin, Illinois

Site Identification No.: 089438ADW  
Application No.: 09080036

Illinois EPA Contacts

Permit Analyst: Jason Schnepf  
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Important Dates:

Application Received: October 20, 2010  
Public Comment Period Begins: November 1, 2010  
Public Comment Period Closes: December 1, 2010

**I. INTRODUCTION**

Printpack has applied for a revised construction permit for installation of two new packaging rotogravure printing lines (P-08 and P-09) with a permanent total enclosure (PTE) with emissions ducted to a new regenerative thermal oxidizer (RTO). Printpack will also install five new seaming machines.

The Illinois EPA has reviewed the application and made a preliminary determination that this application meets applicable requirements. Accordingly, the Illinois EPA has prepared a draft of the air pollution control construction permit that it would propose to issue for this project. However, before issuing this permit, the Illinois EPA is holding a public comment period to receive written comments on the proposed issuance of this permit and the terms and conditions of the draft permit.

**II. PROJECT DESCRIPTION**

This project involves construction of two new rotogravure printing lines. The presses will be used to print packaging material. The emissions of volatile organic material (VOM), from the solvents used in the inks and coating used on the press, will be controlled by a new regenerative thermal oxidizer.

Also to be installed are five new seaming machines. The seaming machines will form a seam in a roll of flat printed plastic film in order to convert the film into a tube. The seaming machines would be a source of VOM emissions from the VOM solvent used in solvent welding the plastic film.

The original project scope also included steps to reduce emissions through: (i) installing an improved capture system on the adhesive application stations on existing laminator L33/34; (ii) ducting existing press P-06 to the upgraded control system, which has a higher control efficiency than the current control device (I02) (See Condition 1.2.1(b)(i)(B)); and (iii) restricting throughput of press P-06 (See Condition 1.2.1(b)(i)(A) and (b)(ii)). The net result of those changes was a net increase in VOM emissions that was not significant for purposes of Major Stationary Sources Construction and Modification (MSCCAM), 35 IAC Part 203.

While these physical changes to achieve emission decreases have been completed, Printpack has determined that they will not need the decreases. Demand at the new equipment has not occurred. It has only installed five new seamers, rather than the six seamers that it was previously permitted to install. To ensure a significant increase in emissions will not occur, Printpack has requested lower permitted emissions for the new equipment so that the reductions at existing equipment are no longer necessary.

**III. APPLICABLE EMISSION STANDARDS**

All emission units in Illinois must comply with Illinois Pollution Control Board emission standards. The Board's emission standard represents the basic requirements for sources in Illinois.

For the new presses, the Permittee would be required to comply with the established requirements for packaging rotogravure presses. In particular, the new presses would be subject to 35 IAC Part 218 Subpart H: Printing and Publishing, which requires an overall reduction in VOM emissions of at least 65 percent. Note, however, these new presses would be subject to much more stringent control requirements (98 percent overall control).

**IV. EVALUATION OF THE CHANGE IN EMISSIONS**

The proposed project is not a major project for purposes of Major Stationary Sources Construction and Modification (MSSCAM), 35 IAC Part 203, also known as nonattainment new source review (NA NSR). Under the initial application, project increases were significant, i.e., greater than 40 tons per year of VOM, so that netting was used to demonstrate that the net emissions increase was less than significant. Under the requested revision, the Permittee would accept lower emission limits for the project such that the project increases are not significant. Accordingly, netting would not be required.

**V. CONTENTS OF DRAFT PERMIT**

The draft of the revised permit contains appropriate conditions for implementation of the applicable state standards for VOM emissions from the units affected by this project. These standards require emissions testing, ongoing monitoring and recordkeeping to verify compliance.

**VI. REQUEST FOR COMMENTS**

It is the Illinois EPA's preliminary determination that the application for revised permit meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit.

Comments are requested by the Illinois EPA on this proposed issuance of a revised permit for this project. If substantial public concern is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.