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

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Important Dates:

Application Received: August 24, 2009
Public Comment Period Begins: December 10, 2009
Public Comment Period Closes: January 9, 2010

I. INTRODUCTION

Printpack has applied for a 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 four 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 four 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.

Finally, Printpack will take actions for certain existing units at the source which that result in decreases in VOM emission. An improved capture system will be installed around the existing adhesive application stations for laminator L33/34 that will provide permanent total enclosure. Existing press P-06 will be ducted to a new regenerative thermal oxidizer that has a higher destruction efficiency compared with the current control device. In addition, restrictions on throughput will be accepted for Press P-06, consistent with the transfer of production to new Press P-08 and P-09.

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. With the exception of the new press, other affected units are existing. With the exception of Title I limits, this permit would not affect applicable requirements for these existing units which requirements are established in the Clean Air Act Permit Program (CAAPP) permit for the source.

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). This is because the project will include certain decrease in VOM emissions so that the net increase in VOM is not significant for purposes of NA NSR. In particular, Printpack has chosen to evaluate the net change in VOM emissions at the source. This evaluation involves summing all creditable increases and decreases in VOM emissions for the project as well as other creditable increases and decreases that have occurred over the contemporaneous[1] time period. The results of this evaluation show that the net changes in VOM emissions for this project will be less than significant, i.e., an increase of 32.6 tons per year compared to the 40.0 ton per year significant emission rate for VOM. A summary of this evaluation is provided in Table 2 of the draft permit.

V. CONTENTS OF DRAFT PERMIT

The draft 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.

The draft permit also includes provisions making the emission decreases relied upon in the netting analysis permanent and enforceable.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this proposed project 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 permit for installation of the two new rotogravure printing presses and four new seaming machines. If substantial public concern is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 164.

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[1]The contemporaneous time period begins August 2004. No other projects have occurred at the source since August 2004 (The seaming machine permitted in Construction Permit 09030015 was not installed. That seaming machine is addressed in this permit in Section 2.2.).