

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Packaging Personified, Inc.
for Construction Permit at
240 Kehoe Boulevard, Carol Stream, Illinois

Site Identification No.: 043020ACJ
Application No.: 06020062

Schedule

Public Comment Period Begins: August 3, 2006
Public Comment Period Closes: September 2, 2006

Illinois EPA Contacts

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I. INTRODUCTION

Packaging Personified, Inc. has applied for Construction Permit for modifications to its flexographic printing operations in Carol Stream. This plant requires air pollution control permits because it is a source of emissions. The Illinois EPA has prepared a draft of the construction 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

Packaging Personified, Inc. is a printing facility located at 246 Kehoe Boulevard, Carol Stream. The emission units at this plant that require an operating permit include 2 flexographic presses utilizing low solvent inks and printing materials, and 2 flexographic presses utilizing a regenerative thermal oxidizer to control emissions by 94%. These units are sources of emissions because the printing inks and solutions contain organic solvents, which are emitted to the atmosphere during the printing process as volatile organic material (VOM). The solvents may also contain some materials that are considered hazardous air pollutants (HAPs).

III. GENERAL DISCUSSION

The printing inks and the associated printing solutions contain solvents that are emitted to the atmosphere. Some of these solvents in the inks and solutions are considered Volatile Organic Material (VOM) and/or Hazardous Air Pollutants (HAP). The facility has requested changes to the way that their material usage is limited, yet maintain the emissions such that are below the major-source-threshold levels of 25 tons per year for VOM, 10 tons per year for individual HAP and 25 tons per year for combined HAP. All other air emissions are well below the 100 ton per year major source threshold levels.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois. The Board has standards for sources of Volatile Organic Material. This site complies with all applicable Board standards.

This source is located in a non-attainment area for ozone. The rules that regulate modifications in these areas are Major Stationary Sources Construction and Modification (MSSCAM), 35 Ill. Adm. Code, Part 203. These rules at the time the emission units were initially installed considered a project be a major modification if the net increase in VOM is greater than or equal to 25 tons per year considering other contemporaneous projects, or if the project would increase VOM emissions by 25 tons or more from a discrete unit, operation or other emitting activity. Packaging Personified, Inc. has requested permit limitations on the source to demonstrate it will maintain its minor source status.

Flexographic printing operations are subject to a National Emission Standards for Hazardous Air Pollutants (NESHAP). These emission standards represent the industry requirements for major sources of Hazardous Air Pollutants (HAP). Packaging Personified has chosen to be a minor (area) source of HAP emissions by selecting printing material containing low or no HAP. The application shows that the plant is in compliance with applicable state and federal HAP emission standards.

V. CONTENTS OF THE PERMIT

The construction permit that the Illinois EPA is proposing to issue identifies the specific emission standards that apply to the emission units at the plant. The conditions of the proposed permit contain limitations and requirements to assure that this plant will be operated as a non-major source. The permit sets limitations on the minimum control efficiency and the amount of printing materials used at this facility. Stack testing verifies the efficiency of the control device and the emissions from the source. The conditions of this permit are to ensure that the source continues to comply with applicable emission standards.

The proposed permit also contain limitations and requirements to assure that this plant is operated as a non-major source that limit the operation and annual emissions of the plant to below the major-source-thresholds of 25 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 proposed permit conditions 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 determination that this project meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois EPA is therefore proposing to issue the construction permit with enforceable limits for the modification of permit limitations for the flexographic printing operations.

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 Ill. Adm. Code Part 166.