

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Fellowes, Inc.  
Attn: Anna DeLeon  
1789 Norwood Avenue  
Itasca, Illinois 60143-1095

<u>Application No.:</u> 02070052	<u>I.D. No.:</u> 043450AAI
<u>Applicant's Designation:</u>	<u>Date Received:</u> January 24, 2008
<u>Subject:</u> Corrugated Box Manufacturer	
<u>Date Issued:</u> March 9, 2010	<u>Expiration Date:</u> March 9, 2015
<u>Location:</u> 1789 Norwood Avenue, Itasca, DuPage County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of one (1) Ward flexo folder gluer (press #: FFG 1) with two Flexographic printing units and die cutter, and folder glue, four (4) Ward Flexo Die Cutters (Press #: Ward 1, 2, 3, and 4) each with two Flexographic printing units and die cutter, glue process, maintenance painting operation, miscellaneous chemical usage operation, two (2) diesel fuel oil storage tanks, miscellaneous storage and wastewater tanks, natural gas-fired furnaces and space heaters, No. 2 distillate fuel oil-fired emergency fire pump, a 250 hp No. 2 distillate fuel oil-fired emergency back-up generator, and a by-products management operation controlled a cyclone and baghouse, 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 Volatile Organic Material (VOM) and 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such 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 establish area source status under the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Printing and Publishing Industry, 40 CFR 63 Subpart KK. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
  - iii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement 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 issuance, a draft of this permit has undergone a public notice and comment period.
  - c. This permit supersedes all operating permits issued for this location.
- 2a. The wide-web flexographic printing presses at this source are subject to a National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A and KK. The Illinois EPA is administering the NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 63.820(a)(2), each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated for which the owner or operator chooses to commit to and meets the criteria of 40 CFR 63.820(a)(2)(i) and (ii) for purposes of establishing the facility to be an area source of HAP with respect to 40 CFR 63 Subpart KK. A facility which establishes area source status through some other mechanism, as described in 40 CFR 63.820(a)(7), is not subject to the provisions of 40 CFR 63 Subpart KK.
    - i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
    - ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.
  - c. Pursuant to 40 CFR 63.820(a)(3), each facility for which the owner or operator chooses to commit to and meets the criteria stated in 40 CFR 63.820(a)(2) shall be considered an area source, and is subject only to the provisions of 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).
  - d. Pursuant to 40 CFR 63.820(a)(4), each facility for which the owner or operator commits to the conditions in 40 CFR 63.820(a)(2) may exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion).
  - e. Pursuant to 40 CFR 63.820(a)(5), each facility for which the owner or operator commits to the conditions in 40 CFR 63.820(a)(2) to become an area source, but subsequently exceeds either of the thresholds in 40 CFR 63.820(a)(2) for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation of its commitment for that 12-month period and shall be considered a

major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, each such facility would be subject to the provisions of 40 CFR 63 Subpart KK as noted in 40 CFR 63.820(a)(1) and would no longer be eligible to use the provisions of 40 CFR 63.820(a)(2), even if in subsequent 12-month periods the facility uses less HAP than the thresholds in 40 CFR 63.820(a)(2).

- f. Pursuant to 40 CFR 63.820(a)(6), an owner or operator of an affected source subject to 40 CFR 63.820(a)(2) who chooses to no longer be subject to 40 CFR 63.820(a)(2) shall notify the Illinois EPA or USEPA of such change. If, by no longer being subject to 40 CFR 63.820(a)(2), the facility at which the affected source is located becomes a major source:
  - i. The owner or operator of an existing source must continue to comply with the HAP usage provisions of 40 CFR 63.820(a)(2) until the source is in compliance with all relevant requirements for existing affected sources under 40 CFR 63 Subpart KK;
  - ii. The owner or operator of a new source must continue to comply with the HAP usage provisions of 40 CFR 63.820(a)(2) until the source is in compliance with all relevant requirements for new affected sources under 40 CFR 63 Subpart KK.
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- 4a. Pursuant to 35 Ill. Adm. Code 214.122(b)(2), no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one

hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hour), burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hour of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu).

- b. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.
  - c. Pursuant to 35 Ill. Adm. Code 214.304, the emissions from the burning of fuel at process emission sources located in the Chicago or St. Louis (Illinois) major metropolitan areas shall comply with applicable 35 Ill. Adm. Code 214 Subparts B through F (i.e., 35 Ill. Adm. Code 214.122).
- 5a. Pursuant to 35 Ill. Adm. Code 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201 or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 218.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 218.121(b)(2).
- b. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall only apply to photochemically reactive material.
  - c. Pursuant to 35 Ill Adm. Code 218.401(a), no owner or operator of a subject flexographic, packaging rotogravure or publication rotogravure printing line shall apply at any time any coating or ink unless the VOM content does not exceed the limitation specified in either 35 Ill Adm. Code 218.401(a)(1) or (a)(2) below. Compliance with 35 Ill Adm. Code 218.401 must be demonstrated through the applicable coating or ink analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.404(c). As an alternative to compliance with 35 Ill Adm. Code 218.401(a), a subject printing line may meet the requirements of 35 Ill Adm. Code 218.401(b) or (c).
    - i. Forty percent VOM by volume of the coating and ink (minus water and any compounds which are specifically exempted from the definition of VOM), or
    - ii. Twenty-five percent VOM by volume of the volatile content in the coating and ink.

- d. Pursuant to 35 Ill. Adm. Code 218.403(b), no owner or operator of a flexographic or rotogravure printing line complying by means of 35 Ill. Adm. Code 218.401(a) shall operate said printing line on or after a date consistent with 35 Ill. Adm. Code 218.106, unless the owner or operator has complied with, and continues to comply with, 35 Ill. Adm. Code 218.401(a) and 35 Ill. Adm. Code 218.404(c).
  
- 6a. Pursuant to 35 Ill. Adm. Code 218.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).
  
- b. Pursuant to 35 Ill. Adm. Code 218.204(c), the paper coating limitation shall not apply to any owner or operator of any paper coating line on which flexographic or rotogravure printing is performed if the paper coating line complies with the emissions limitations in 35 Ill. Adm. Code 218.401. In addition, screen printing on paper is not regulated as paper coating, but is regulated under 35 Ill. Adm. Code 218 Subpart TT.
  
- c. Pursuant to 35 Ill. Adm. Code 218.208(a) the limitations of 35 Ill. Adm. Code 218 Subpart F shall not apply to coating lines within a source, that otherwise would be subject to the same subsection of 35 Ill. Adm. Code 218.204 (because they belong to the same coating category, e.g. can coating), provided that combined actual emissions of VOM from all lines at the source subject to that subsection never exceed 6.8 kg/day [15 lbs/day] before the application of capture systems and control devices. (For example, can coating lines within a source would not be subject to the limitations of 35 Ill. Adm. Code 218.204(b) if the combined actual emissions of VOM from the can coating lines never exceed 6.8 kg/day [15 lbs/day] before the application of capture systems and control devices.) Volatile organic material emissions from heavy off-highway vehicle products coating lines must be combined with VOM emissions from miscellaneous metal parts and products coating lines to determine applicability. Any owner or operator of a coating source shall comply with the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211 (a) if total VOM emissions from the subject coating lines are always less than or equal to 6.8 kg/day [15 lbs/day] before the application of capture systems and control devices and, therefore, are not subject to the limitations of 35 Ill. Adm. Code 218.204. Once a category of coating lines at a source is subject to the limitations in 35 Ill. Adm. Code 218.204 the coating lines are always subject to the limitations in 35 Ill. Adm. Code 218.204.
  
- d. Pursuant to 35 Ill. Adm. Code 218.980(b)(1)(A), a source is subject to 35 Ill. Adm. Code 218 Subpart TT if it has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate, from emission units, other than furnaces at glass container manufacturing sources and VOM leaks from components, that are not regulated by 35 Ill. Adm. Code

218 Subparts B, E, F, H, Q, R, S, T, (excluding 35 Ill. Adm. Code 218.486), V, X, Y, Z, or BB.

- 7a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the cyclone and baghouse such that the cyclone and baghouse are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- c. The furnaces and space heaters shall only be operated with natural gas as the fuel. The use of any other fuel in the furnaces and space heaters requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- d. The generator set and fire pump shall only be operated with distillate fuel oil as the fuel. The use of any other fuel in the generator set and fire pump requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- e. The Permittee shall not keep, store, or use distillate fuel oil (Grades No. 1 and 2) at this source with a sulfur content greater than the larger of the following two values:
  - i. 0.28 weight percent, or
  - ii. The wt. percent given by the formula: Maximum wt. percent sulfur = (0.000015) x (Gross heating value of oil, Btu/lb).
- f. Organic liquid by-products or waste materials shall not be used in any emission unit at this source without written approval from the Illinois EPA.
- g. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
- 8a. VOM usage in raw materials and VOM emissions from manufacturing activities at the plant shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>Tons/Month</u>	<u>Tons/Year</u>	<u>Tons/Month</u>	<u>Tons/Year</u>
2.50	21.00	2.50	21.00

These limits are based on the maximum material usage and the maximum VOM content of these materials. The above limitations are being

established in this permit to ensure that the screen printing operation is not subject to the control requirements of 35 Ill. Adm. Code Part 218, Subpart TT (Other Emission Units).

- b. This permit is issued based on negligible emissions of volatile organic material from the miscellaneous storage and wastewater tanks, power shred assembly, and two diesel fuel storage tanks. For this purpose, emissions from all such emissions units shall not exceed nominal emission rates of 0.10 lb/hour and 0.44 tons/year.
- c. Emissions from and operation of the furnaces and heaters shall not exceed the following limits:
  - i. Natural Gas usage: 28 mmscf/month, 251 mmscf/year;
  - ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	<u>Emission Factor (lbs/mmscf)</u>	<u>Emissions (Tons/Mo)</u>	<u>Emissions (Tons/Yr)</u>
Carbon Monoxide (CO)	84.0	1.18	10.54
Nitrogen Oxides (NO <sub>x</sub> )	100.0	1.40	12.55
Particulate Matter (PM)	7.6	0.11	0.95
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.01	0.08
Volatile Organic Material (VOM)	5.5	0.08	0.69

These are based on maximum fuel usage and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- d. Emissions from the 6.7 mmBtu/hour emergency fire pump shall not exceed the following limits:

<u>Pollutant</u>	<u>Emission Factor (lbs/mmBtu)</u>	<u>Emissions (lbs/Hour)</u>	<u>Emissions (Tons/Year)</u>
Carbon Monoxide (CO)	0.95	6.4	0.16
Nitrogen Oxides (NO <sub>x</sub> )	4.41	29.6	0.74
Particulate Matter (PM)	0.31	2.1	0.05
Sulfur Dioxide (SO <sub>2</sub> )	0.29	2.0	0.05
Volatile Organic Material (VOM)	0.35	2.4	0.06

These limits are based on maximum firing capacity, maximum hours of operation (50 hr/yr), and standard emission factors (Table 3.3-1, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- c. Emissions from the 2.1 mmBtu/hour emergency back-up generator set shall not exceed the following limits:

<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>Factor</u> <u>(lbs/mmBtu)</u>	<u>(lbs/Hour)</u>	<u>(Tons/Year)</u>
Carbon Monoxide (CO)	0.95	2.0	0.50
Nitrogen Oxides (NO <sub>x</sub> )	4.41	9.3	2.32
Particulate Matter (PM)	0.31	0.65	0.16
Sulfur Dioxide (SO <sub>2</sub> )	0.29	0.61	0.15
Volatile Organic Material (VOM)	0.35	0.74	0.18

These limits are based on maximum firing capacity, maximum hours of operation (500 hr/yr), and standard emission factors (Table 3.3-1, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- d. This permit is issued based on negligible emissions of particulate matter from the byproducts management operation. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
9. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a CAAPP permit from the Illinois EPA and establishes area source status under the NESHAP for Printing and Publishing Industry, 40 CFR 63 Subpart KK.
  10. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
  - 11a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
    - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of

air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Conditions 12 and 13 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 12. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 13a. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.
- b. Pursuant to 35 Ill. Adm. Code 218.404(a), the VOM content of each coating and ink and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.404.
- 14. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is

unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

15. Pursuant to 40 CFR 63.829(d), the owner or operator of each facility which commits to the criteria of 40 CFR 63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.
16. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 17a. Pursuant to 35 Ill. Adm. Code 218.129(f), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 Ill. Adm. Code Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.
- b. Pursuant to 35 Ill. Adm. Code 218.211(b)(3), any owner or operator of a coating line which is exempted from the limitations of 35 Ill. Adm. Code 218.204 because of 35 Ill. Adm. Code 218.208(a) or (b) shall for sources exempt under 35 Ill. Adm. Code 218.208(a), on and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a coating line or group of coating lines referenced in this subsection shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating as applied on each coating line; and
  - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted

from the definition of VOM) as applied each day on each coating line.

- c. Pursuant to 35 Ill. Adm. Code 218.404(c)(2), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(a) shall collect and record all of the following information each day for each printing line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating and ink as applied on each printing line.
  - ii. The VOM content of each coating and ink as applied each day on each printing line.
- 18a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. Records addressing use of good operating practices for the cyclone and baghouse:
    - A. Records for periodic inspection of the cyclone and baghouse with date, individual performing the inspection, and nature of inspection; and
    - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
  - ii. Amount of each VOM/HAP containing material used in the printing operations, maintenance painting operation, glue process, and miscellaneous chemical usage operation (tons/month and tons/year or gallons/month and gallons/year);
  - iii. VOM and HAP content of each VOM/HAP containing material used in the printing operations, maintenance painting operation, glue process, and miscellaneous chemical usage operation (percent weight or lb VOM/gallon);
  - iv. Calculations of VOM/HAP usage for the flexographic printing operation, maintenance painting operation, glue process, and miscellaneous chemical usage operation. The following equations shall be used to calculate VOM/HAP usage and emissions:

$$Te = \sum_i^n AiBi$$

Where:

Te = VOM/HAP usage/emissions (lbs);

- n = Number of different VOM/HAP containing material used;
- i = Subscript denoting an individual VOM/HAP containing material used;
- A<sub>i</sub> = weight percent of VOM and HAP of each VOM/HAP containing material used each month (% weight); and
- B<sub>i</sub> = Amount of each VOM/HAP containing material used (lbs).
- v. Natural gas usage for the furnaces and heaters (mmscf/month and mmscf/year);
- vi. Hours of operation for the emergency engine pump for fire water and the emergency backup generator (hours/month and hours/year); and
- vii. The sulfur content of the used oil used in the fire pump and backup generator (% weight), this shall be recorded for each shipment of oil delivered to the source; and
- viii. Monthly and annual CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAP emissions with supporting calculation (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 (5) 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.
19. Pursuant to 40 CFR 63.830(b)(6)(ii), each owner or operator of an affected source subject to 40 CFR 63 Subpart KK shall submit to the Illinois EPA or USEPA A summary report specified in 40 CFR 63.10(e)(3) shall be submitted on a semi-annual basis (i.e., once every 6-month period). These summary reports are required even if the affected source does not have any control devices or does not take the performance of any control devices into account in demonstrating compliance with the emission limitations in 40 CFR 63.824 or 40 CFR 63.825. In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i), the summary report shall include exceedances of either of the criteria of 40 CFR 63.820(a)(2).
20. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.

- 21a. Pursuant to 35 Ill. Adm. Code 218.211(b)(5), the owner or operator of a coating line or group of coating lines exempted from the limitations of 35 Ill. Adm. Code 218.204 because of 35 Ill. Adm. Code 218.208(a) shall notify the Illinois EPA of any record showing that total VOM emissions from the coating line or group of coating lines exceed 6.8 kg (15 lbs) in any day before the application of capture systems and control devices by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs.
- b. Pursuant to 35 Ill. Adm. Code 218.404(c)(3), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 218.401 and complying by means of 35 Ill. Adm. Code 218.401(a) shall notify the Illinois EPA in the following instances:
- i. Any record showing violation of Section 218.401(a) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
- ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(a) to 35 Ill. Adm. Code 218.401(b) or (c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(d)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(a) to 35 Ill. Adm. Code 218.401(b) or (c), the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.404(d) or (e), respectively.
- c. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
- 22a. If there is an exceedance of or a deviation from 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 or deviation. 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 deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications 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

If you have any questions on this, please call Jocelyn Stakely at 217/782-2113.

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

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

ECB:JRS:psj

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from corrugated box manufacturing facility 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 well below the levels (e.g., 100 tons/year for volatile organic material (VOM), 10 tons per year for a single HAP, and 25 tons per year for any combination of such HAP) 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.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)					Single	Total
	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>	<u>HAP</u>	<u>HAPs</u>
Printing, Gluing, Painting and Miscellaneous Chemicals Usage					21.00		
Storage Tanks					0.44		
Furnaces & Heaters	10.54	12.55	0.95	0.08	0.69		
Emergency Fire Pump	0.16	0.74	0.05	0.05	0.06		
Emergency Back-up Generator Set	0.50	2.32	0.16	0.15	0.18		
Byproducts Management	-----	-----	<u>0.44</u>	-----	-----	-----	-----
Totals	<u>11.20</u>	<u>15.61</u>	<u>1.60</u>	<u>0.28</u>	<u>22.37</u>	<u>9.0</u>	<u>22.5</u>

JRS:psj