

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Weyerhaeuser Company  
Attn: Chris Feegle  
2100 - 23rd Avenue  
Rockford, Illinois 61104

Application No.: 01060050

I.D. No.: 201030AFG

Applicant's Designation:

Date Received: June 13, 2001

Subject: Corrugated and Solid Fiber Boxes

Date Issued:

Expiration Date:

Location: 2100 - 23rd Avenue, Rockford, Winnebago County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 4 flexographic printer/gluers, 3 flexographic printing presses, corrugator, corrugated scrap collector, 2-color die cutter, starch silo with filter and natural gas-fired combustion equipment 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 to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled 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.
- 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 as 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) of this subpart.
- 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 this subpart 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. 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 the requirements of 35 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. 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 subsection (c) of 35 Ill. Adm. Code 212.321.
- 4. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hour) to exceed 200 ppm, corrected to 50 percent excess air, pursuant to 35 Ill. Adm. Code 216.121.
- 5a. Pursuant to 35 Ill. Adm. Code 215.301, 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 source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K shall apply only to photochemically reactive material.
- b. Pursuant to 35 Ill. Adm. Code 215.402, the limitations of 35 Ill. Adm. Code 215 Subpart P: Printing And Publishing shall not apply to any facility whose aggregate uncontrolled rotogravure and/or flexographic printing press emissions of volatile organic material are limited by operating permit conditions to 907 Mg (1000 tons) per year or less in the absence of air pollution control equipment or whose actual emissions in the absence of air pollution control equipment would be less than or equal to 907 Mg (1000 tons) per year when averaged over the preceding three calendar years.
- 6a. Emissions and operation of the printers and gluers shall not exceed the following limits:
  - i. Ink Application

Ink Usage		VOM Content	VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Wt. %)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
99.4	994	6	5.96	59.6

ii. Adhesive Application

Adhesive Usage		VOM Content	VOM Emissions	
(Tons/Mo)	(Tons/Yr)	(Wt. %)	(Tons/Mo)	(Tons/Yr)
8.75	87.5	6	0.52	5.2

These limits are based on the maximum operating rate and year round operations.

b. Emissions and operation of the corrugator shall not exceed the following limits:

Production Rate		Emission Factor	E M I S S I O N S			
(1000 Sq Ft/Mo)	(1000 Sq Ft/Yr)	(Lb VOM/1000 Sq. Ft)	VOM	PM		
			(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)
301,081	3,010,812	0.00756	1.14	11.4	0.85	8.5

These limits are based on the maximum operating rate, emission factor provided by manufacturer, and year round operations.

c. Operation and emissions of the natural gas combustion equipment shall not exceed the following limits:

i. Natural Gas Usage: 18.4 mmscf/month and 184 mmscf/year

ii. Emissions from combustion of natural gas:

<u>Pollutant</u>	Emission Factor	Emissions	
	(Lb/mmscf)	(Tons/Mo)	(Tons/Yr)
Carbon Monoxide (CO)	84	0.78	7.73
Nitrogen Oxides (NO <sub>x</sub> )	100	0.92	9.20
Particulate Matter (PM)	7.6	0.07	0.70
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.01	0.06
Volatile Organic Material (VOM)	5.5	0.05	0.51

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

d. Emissions of particulate matter from the corrugated scrap collector system shall not exceed nominal emission rates of 4.60 lbs/hour and 7.3 tons/year. These limits are based on the maximum operating rate and control efficiency.

e. This permit is issued based on negligible emissions of PM from starch silo. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.22 tons/year.

7. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons per year of any single HAP and 25 tons per 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 requirement to obtain a Clean Air Act Permit Program (CAAPP) permit.
8. 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).
- 9a. 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.
- b. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. Monthly and annual usage of the inks, adhesives and solvents (tons/month, tons/year);
  - ii. VOM and HAP contents of the materials used (weight %);
  - iii. Corrugator production rate (square feet per year and square feet per month);
  - iv. Natural gas usage (mmscf/month, mmscf/year); and
  - v. Monthly and annual CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAP emissions with supporting calculations (tons/month and tons/year).
10. 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.
11. 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).

12. 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/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.
13. Two (2) copies of required reports and 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  
5415 North University  
Peoria, Illinois 61614

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

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:DWH:psj

cc: Illinois EPA, FOS Region 2  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the source 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 per year of VOM, 10 tons per year for a single HAP, and 25 tons per year of totaled 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 Units</u>	E M I S S I O N S (Tons/Year)						HAPs	
	<u>VOM</u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>Single</u>	<u>Total</u>	
	Printers and Gluers	59.60	-----	-----	-----	-----	-----	-----
Corrugator	11.40	-----	-----	8.50	-----	-----	-----	
Combustion Equipment	0.51	9.2	7.73	0.70	0.06	-----	-----	
Scrap Collector	-----	-----	-----	7.30	-----	-----	-----	
Starch Silo	-----	-----	-----	0.22	-----	-----	-----	
Plant-Wide Total	71.51	9.2	7.73	16.72	0.06	< 10	< 25	

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