

Illinois Environmental Protection Agency
Bureau OF Air, Permit Section
1021 N. Grand Avenue East
Post Office Box 19506
Springfield, Illinois 62794-9506

Project Summary for an Application from
Weyerhaeuser Company for a
Federally Enforceable State Operating Permit (FESOP)
For Rockford, Illinois

Site Identification Number: 201030AFG
Application No.: 01060050

Illinois EPA Contacts

Permit Analyst: David Hulskotter
Community Relations Contact: Brad Frost

I. INTRODUCTION

Weyerhaeuser Company has applied for a Federally Enforceable State Operating Permit (FESOP) for its cardboard box manufacturing plant at 2100 – 23rd Avenue in Rockford. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the 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

The source manufactures corrugated container board packaging, cardboard boxes. Printing units print onto the cardboard. The emission units at this plant that require an operating permit include 4 flexographic printers/glueers, 3 flexographic printing presses, corrugator, scrap collector, 2 – color die cutter, starch silo with filter and natural gas-fired combustion equipment. The printing inks, adhesives and associated printing solutions contain organic solvents which are emitted to the atmosphere during the printing process as volatile organic material (VOM). These materials also contain components that are considered hazardous air pollutants (HAPs).

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has applied for a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons of VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in

Illinois. Flexographic printing is regulated by 35 Ill. Adm. Code 215 Subpart P: Printing and Publishing in the Rockford area. However, the VOM emissions at this plant are well below the applicability level of Subpart P. Flexographic printing is regulated by the National Emission Standards for Printing and Publishing, 40 CFR 63, Subpart KK. However, the emission standards of Subpart KK do not apply to plants limited to synthetic minor status as this plant is. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards).

V. CONTENTS OF THE PERMIT

This permit that the Illinois EPA is proposing will identify the specific emission standards that apply to the emission units at the plant. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 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.)

This permit sets limitations on ink and adhesive usage and the amount of VOM in these materials. This permit would also set limitations on the amount of natural gas combusted. The permit requires the Permittee to keep records of the ink, adhesive usage and the natural gas combusted. With the records the Permittee maintains the Illinois EPA can verify compliance with Permit Conditions and calculate the plants air emissions. These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions would 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 preliminary determination that the source has met the requirements for issuance of its permit. The Illinois EPA is therefore proposing to issue the permit.

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 IAC Part 166.

DWH:01060050:psj