

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

International Paper Co.  
Attn: Jim Schuhardt  
3001 Otto Street  
Belleville, IL 62226

Application No.: 90090035

I.D. No.: 163010AEZ

Applicant's Designation:

Date Received: February 24, 2011

Subject: Box Manufacturer

Date Issued:

Expiration Date:

Location: 3001 Otto Street, Belleville, St. Clair 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) 16.8 mmBtu/Hour Natural Gas-Fired Boiler and Heating System;
- One (1) Scrap/Trim Reclamation System with 9 Pick Up Points to One (1) Cyclone;
- One (1) Water Based Glue System;
- One (1) Water Based Printing System;
- One (1) Coating System;
- One (1) Corrugator;
- One (1) Die Preparation Room;
- One (1) Corn Starch Storage Silo with Baghouse; and
- One (1) Three-Color Flexo Folder Gluer

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 per year for Volatile Organic Material (VOM), 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 federally enforceable production and operating limitations, which restrict the 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 so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK.

- iii. To establish federally enforceable production and operating limitations, which restrict the maximum theoretical emissions of VOM to less than 100 tons per year so that the flexographic presses at this source are not subject to the control requirements of 35 Ill. Adm. Code 219.401 (Flexographic and Rotogravure Printing).
  - 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. 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).
3. Pursuant to 35 Ill. Adm. Code 216.121, 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/hr) to exceed 200 ppm, corrected to 50 percent excess air.
- 4a. Pursuant to 35 Ill. Adm. Code 219.204(c)(2), except as provided in 35 Ill. Adm. Code 219.205, 219.207, 219.208, 219.212, 219.215 and 219.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Paper Coating. Except as otherwise provided in 35 Ill. Adm. Code 219.204(a), (c), (g), (h), (j), (l), (n), (o), and (q), compliance with the emission limitations is required on and after March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each

coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with this Subpart must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 219.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 219.211(c) except where noted. (Note: The equation presented in 35 Ill. Adm. Code 219.206 shall be used to calculate emission limitations for determining compliance by add-on controls, credits for transfer efficiency, emissions trades and cross-line averaging.) The emission limitations are as follows:

- | Paper Coating On and after May 1, 2011                | kg VOM/kg<br>(lb VOM/lb)<br>solids<br>applied | kg VOM/kg<br>(lb VOM/lb)<br>coatings<br>applied |
|---|---|---|
| i. Pressure sensitive tape and label surface coatings | 0.20  | (0.067)   |
| ii. All other paper coatings                          | 0.40  | (0.08)  |
- b. Pursuant to 35 Ill. Adm. Code 219.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 219.302, 219.303, 219.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 219 Subpart G shall apply only to photochemically reactive material.
5. This permit is issued based upon the flexographic printing presses not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK. This is a result of the federally enforceable production and operating limitations, which restrict the 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.
- 6a. This permit is issued based on the flexographic printing presses not being subject to 35 Ill. Adm. Code 219.187 (Other Industrial Solvent Cleaning Operations). Pursuant to 35 Ill. Adm. Code 219.187(a)(2)(B), notwithstanding 35 Ill. Adm. Code 219.187(a)(1), cleaning operations for emission units within the following categories shall be exempt from the requirements of 35 Ill. Adm. Code 219.187(b), (c), (d), (e), (f), and (g);
- i. Flexible package printing; and
  - ii. Paper, film, and foil coating;
- b. Pursuant to 35 Ill. Adm. Code 219.204(c)(3), the paper coating limitation set forth in 35 Ill. Adm. Code 219.204(c) shall not apply to any owner or operator of any paper coating line on which flexographic, rotogravure, lithographic, or letterpress printing is performed if the

paper coating line complies with the applicable emissions limitations in 35 Ill. Adm. Code 219 Subpart H. In addition, screen printing on paper is not regulated as paper coating, but is regulated under 35 Ill. Adm. Code 219 Subpart TT. On and after May 1, 2011, the paper coating limitation shall also not apply to coating performed on or in-line with any digital printing press, or to size presses and on-machine coaters on papermaking machines applying sizing or water-based clays.

- c. Pursuant to 35 Ill. Adm. Code 219.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 is required to meet the limitations of 35 Ill. Adm. Code Subpart G (35 Ill. Adm. Code 219.301 or 219.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 219.204.
- d. This permit is issued based upon the flexographic printing press not being subject to the requirements of 35 Ill. Adm. Code 219.401 (Flexographic and Rotogravure Printing.) This is a result of the federally enforceable production and operating limitations, which restrict the maximum theoretical emissions of VOM from this facility to less than 100 tons per year and the potential to emit for VOM emissions to less than 25 tons per year. Pursuant to 35 Ill. Adm. Code 219.402(a)(1), except as otherwise provided in 35 Ill. Adm. Code 219.401, the limitations of 35 Ill. Adm. Code 219.401 apply to all flexographic and rotogravure printing lines at a subject source. Sources with flexographic and/or rotogravure printing lines are subject sources unless:
  - i. Total maximum theoretical emissions of VOM from all flexographic and rotogravure printing lines (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines), at the source never exceed 90.7 Mg (100 tons) per calendar year before the application of capture systems and control devices, or
  - ii. A federally enforceable permit or SIP revision for all flexographic and rotogravure printing lines at a source requires the owner or operator to limit production or capacity of these printing lines to reduce total VOM emissions from all flexographic and rotogravure printing lines to 90.7 Mg (100 tons) or less per calendar year before the application of capture systems and control devices.
- 7a. Pursuant to 35 Ill. Adm. Code 219.218(a), on and after May 1, 2011, every owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 219.204(c) shall:
  - i. Store all VOM-containing cleaning materials in closed containers;
  - ii. Ensure that mixing and storage containers used for VOM-containing materials are kept closed at all times except when depositing or removing those materials;

- iii. Minimize spills of VOM-containing cleaning materials;
  - iv. Convey VOM-containing cleaning materials from one location to another in closed containers or pipes; and
  - v. Minimize VOM emissions from the cleaning of storage, mixing, and conveying equipment.
- b. Pursuant to 35 Ill. Adm. Code 219.401(d), no owner or operator of subject flexographic or rotogravure printing lines that print flexible packaging or print flexible packaging and non-flexible packaging on the same line shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with the subject flexographic or rotogravure printing lines to be kept, stored, or disposed of in any manner other than in closed containers, or conveyed from one location to another in any manner other than in closed containers or pipes, except when specifically in use.
- c. Pursuant to 35 Ill. Adm. Code 219.402(b), the limitations of 35 Ill. Adm. Code 219.401(d) shall apply to all owners or operators of flexographic or rotogravure printing lines that print flexible packaging, or that print flexible packaging and non-flexible packaging on the same line, at a source where the combined emissions of VOM from all flexographic and rotogravure printing lines total 6.8 kg/day (15 lbs/day) or more (including solvents used for cleanup operations associated with flexographic and rotogravure printing lines), in the absence of air pollution control equipment.
- 8a. 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 baghouse associated with the corn starch storage silo such that the baghouse is kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- c. The Boiler and Heating System shall only be operated with natural gas as the fuel. The use of any other fuel in the Boiler and Heating System 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.
- 9a. Emissions and operation of the Boiler and Heating System shall not exceed the following limits:

<u>Item of Equipment</u>	<u>(mmBtu/Hr)</u>	<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
			<u>Factor</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
			<u>(lb/mmBtu)</u>		
Boiler	16.8	CO	0.082	0.60	6.03
		NO <sub>x</sub>	0.098	0.72	7.21
		PM	0.007	0.06	0.55
		SO <sub>2</sub>	0.001	0.01	0.07
		VOM	0.005	0.04	0.40

These limits are based on standard emission factors and 8,760 hours of operation (Tables 1.4-1 and 1.4-2, AP-42, Volume I, Fifth Edition, Supplement D, July 1998).

- b. Operation and emissions of the coating and printing process (combined) shall not exceed the following limits:

<u>Materials</u>	<u>Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(lbs/Mo)</u>	<u>(lbs/Yr)</u>		<u>(%. by Wt.)</u>	<u>(lbs/Mo)</u>
Printing Ink	20,000	240,000	15.0	3,000	18.00
Product Coatings	20,000	240,000	2.0	400	2.40
Adhesives	15,000	180,000	6.0	900	5.40
				Total	25.80

These limits are based on the maximum operating rate and the maximum VOM contents of the inks, coatings and adhesives. The VOM and HAP emissions from printing operations shall be determined from the following equation:

$$E = \Sigma (M_i \times C_i),$$

Where:

E = VOM or HAP emissions (ton);

M<sub>i</sub> = VOM or HAP-containing materials usage (ton);

C<sub>i</sub> = VOM or HAP content of the materials (% by weight).

- c. Emissions and operation of equipment shall not exceed the following limits:

<u>Equipment</u>	<u>Throughput</u>		<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>(10<sup>6</sup> ft<sup>2</sup>/Mo)</u>	<u>(10<sup>6</sup> ft<sup>2</sup>/Yr)</u>		<u>Factors</u>	<u>(lbs/Mo)</u>	<u>(Tons/Yr)</u>
				<u>(lb/1000 Ft<sup>3</sup>)</u>		
Corrugator	215.0	2,580	PM	0.00567	1,218.4	7.31
			VOM	0.00756	1,625.4	9.75

These limits are based on the maximum operating rate of the corrugator and emission factors developed through an emissions study conducted at another similar source, which is owned by the Permittee.

- d. Emissions and operation of equipment shall not exceed the following limits:

<u>Process</u>	<u>Throughput</u>		<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>		<u>Factor</u>	<u>(lbs/Mo)</u>	<u>(Tons/Yr)</u>
Scrap Reclamation	4,000	48,000	PM	1.0	2.45	24.52

These limits are based on the maximum operating rate of the scrap reclamation system and the manufacturer's emission factor.

- e. This permit is issued based on negligible emissions of particulate matter from cornstarch storage silo. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- f. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this 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 any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA and the requirements of the NESHAP for the Printing and Publishing Industry, 40 CFR 63 Subpart KK.
- g. Compliance with annual limits 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).
- 10a. 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 11 and 12 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 11. 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.
- 12a. Pursuant to 35 Ill. Adm. Code 219.211(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 219.105 to establish the records required under 35 Ill. Adm. Code 219.211.
- b. Pursuant to 35 Ill. Adm. Code 219.404(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 219.105 to establish the records required under 35 Ill. Adm. Code 219.404.
- 13. 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.

14. 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.
- 15a. Pursuant to 35 Ill. Adm. Code 219.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 other than 35 Ill. Adm. Code 219.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 219.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 219.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless otherwise specified, 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;
  - ii. The weight of VOM per volume of each coating (minus water and any compounds that are specifically exempted from the definition of VOM) as applied each day on each coating line;
  - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 219.204(c)(2), the weight of VOM per weight of solids (or the weight of VOM per weight of coatings, as applicable) in each coating as applied each day on each coating line, and certified product data sheets for each coating;
- b. Pursuant to 35 Ill. Adm. Code 219.404(b)(2), Any owner or operator of a printing line which is exempted from any of the limitations of 35 Ill. Adm. Code 219.401 because of the criteria in 35 Ill. Adm. Code 219.402(a) shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 219.106, or, for flexographic or rotogravure printing lines that print flexible packaging or that print flexible packaging and non-flexible packaging on the same line, on and

after January 1, 2012, the owner or operator of a facility referenced in this subsection shall collect and record all of the following information each year 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 and the volume of each coating and ink as applied each year on each printing line.
- c. Pursuant to 35 Ill. Adm. Code 219.404(h), all records required by 35 Ill. Adm. Code 219.404(f) and (g) shall be retained for at least three years and shall be made available to the Illinois EPA upon request.
- 16a. 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 baghouse associated with the corn starch storage silo:
    - A. Records for periodic inspection of the baghouse associated with the corn starch storage silo 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 usage of inks, additives, clean-up solvents and other VOM or HAP-containing materials used (tons/month, tons/year);
  - iii. VOM and HAP content of materials used (weight %);
  - iv. Natural gas usage, (million ft<sup>3</sup>/month and million ft<sup>3</sup>/year);
  - v. Amount of Scrap Reclaimed (tons/month and tons/year);
  - vi. Corrugator throughput (ft<sup>2</sup>/month, ft<sup>2</sup>/year); and
  - vii. Monthly and annual CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAP emissions from the source with supporting calculations (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 storage device) 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.

17. 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.
  
- 18a. Pursuant to 35 Ill. Adm. Code 219.211(c) (3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 other than 35 Ill. Adm. Code 219.204(a) (1) (B), (a) (1) (C), (a) (2) (B), (a) (2) (C), or (a) (2) (D) and complying by means of 35 Ill. Adm. Code 219.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 219.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
  - i. Any record showing violation of 35 Ill. Adm. Code 219.204 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 from 35 Ill. Adm. Code 219.204 to 35 Ill. Adm. Code 219.205 or 35 Ill. Adm. Code 219.207, the owner or operator shall comply with all requirements of subsection 35 Ill. Adm. Code 219.211(d) (1) or (e) (1), as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 219.204 to 35 Ill. Adm. Code 219.205 or 35 Ill. Adm. Code 219.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 219.211(d) or (e), as applicable.
  
- b. Pursuant to 35 Ill. Adm. Code 219.404(b) (3), on and after a date consistent with 35 Ill. Adm. Code 219.106, or, for flexographic or rotogravure printing lines that print flexible packaging or that print flexible packaging and non-flexible packaging on the same line, on and after January 1, 2012, the owner or operator of a facility exempted from the limitations of 35 Ill. Adm. Code 219.401 because of the criteria in 35 Ill. Adm. Code 219.402(a) shall notify the Illinois EPA of any record showing that total maximum theoretical emissions of VOM from all printing lines exceed 90.7 Mg (100 tons) in any calendar year before the application of capture systems and control devices by sending a copy of such record to the Agency within 30 days after the exceedance occurs.
  
- c. Pursuant to 35 Ill. Adm. Code 219.404(g) (2), any owner or operator of a printing line subject to the limitations of 35 Ill. Adm. Code 219.401(d) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 219.401(d) by sending a description of the violation and copies of records documenting such violations to the Illinois EPA within 30 days following the occurrence of the violation.

19a. 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  
2009 Mall Street  
Collinsville, Illinois 62234

If you have any questions on this permit, please call Randy Solomon at 217/785-1705.

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

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

ECB:RBS:

cc: Illinois EPA, FOS Region 3  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from box manufacturing plant 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 below the levels (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/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	Combined
	<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>	
Boiler and Heating System	6.03	7.21	0.55	0.07	0.40			
Printing, Coating and Die Preparation					25.80			
Corrugator			7.31		9.75			
Scrap Reclamation			24.52					
Cornstarch Storage Silo	--	--	<u>0.44</u>	--	--	--	--	
Totals	6.03	7.21	32.82	0.07	35.95	9.0	22.5	