

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
DOT Packaging Group for a
Federally Enforceable State Operating Permit (FESOP) for
1500 Paramount Parkway
Batavia, Illinois 60510

Site Identification No.: 089010ACG
Application No.: 95090134

Illinois EPA Contacts

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I. INTRODUCTION

Dot Packaging Group, Inc. has applied for a Federally Enforceable State Operating Permit (FESOP) for its coldest sheetfed offset lithographic printing plant at 1500 Paramount Parkway in Batavia. 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

Dot Packaging Group, Inc. operates a coldest sheetfed offset lithographic printing plant in Batavia, Illinois. Various printed packaging materials including advertisements are printed on paper substrate. There are three coldest sheetfed presses. The lithographic printing presses do not have exhausts. Two of the lithographic printing presses have water based coating units with electrically heated dryers that are exhausted to the atmosphere.

The unprinted paperboard is sheetfed and sent to one of three sheetfed lithographic printing presses. After drying the printed paperboard is sent to one of the two coating lines. There is one solvent based coating line and one water based coating line. The exhaust from the solvent based coating line is directed through a catalytic oxidizer for control of VOM emissions. The water based coating line is predominantly used to apply tape to the printed and coated paper substrates.

The emissions of volatile organic material (VOM) resulting from the use of lithographic printing-related materials and coating materials such as lithographic inks, fountain solution additives, coatings and cleaning solvents. These materials contain organic solvents which are emitted to the atmosphere during their use. To minimize VOM losses from manual press cleaning operations, a manual blanket wash cleaning solvent is used that has a low VOM composite partial vapor pressure (<10 mmHg at 20°C). In addition, all cleaning materials, including the used cleaning towels, are stored in closed containers at all times they are not in use.

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 not 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 for 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. The Board has specific standards for units emitting volatile organic material in the greater Chicago Area. The coating operation at Dot packaging is regulated by Paper Coating Regulations 35 Ill. Adm. Code 218.204(c) or 218.207. These regulations require the coating only contain 2.3 pounds of volatile organic material per gallon or an 81 percent reduction in emissions of volatile organic material by an air pollution control device. 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.)

The permit conditions would also 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 that 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 renew 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.

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