

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Sonoco Consumer Products Company
Attn: Mr. Joe Krussel
1500 Powis Road
West Chicago, Illinois 60185

Application No.: 01030008

I.D. No.: 043090ADF

Applicant's Designation:

Date Received: March 5, 2001

Subject: Composite Container MFG

Date Issued: DRAFT

Expiration Date:

Location: 1500 Powis Road, West Chicago

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of five container production lines, equipment itemized in Attachment B 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 ton/year of particulate matter less than 10 microns in diameter (PM₁₀), 100 tons/year of volatile organic material 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of 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 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.
 - iii. This permit is issued based upon the plant not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart PP (Miscellaneous Fabricated Product Manufacturing Processes) and 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units). This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 218.301, 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 source, except as provided in 35 Ill. Adm. Code 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G: Use of Organic Material, shall apply only to photochemically reactive material.

- b. In the event that the operation of this emission unit 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.
- 3a. Emissions and operations of the five container productions lines shall not exceed the following limits:

VOM Containing Material Usage		VOM Content	VOM Emissions	
(Lb/Mo)	(Ton/Yr)	(wt.%)	(Ton/Mo)	(Ton/Yr)
4,166.4	24.5	100	2.08	24.5

These limits are based on maximum material usage and a maximum VOM content of each VOM containing material. Compliance with annual limits shall be determined by a running total of 12 months of data.

- b. Emissions and operation of the five container productions lines shall not exceed the following limits:

Total Material Processed		PM Control Efficiency	PM Emissions	
(Ton/Mo)	(Ton/Yr)	(%)	(Ton/Mo)	(Ton/Yr)
1742.4	20,461.2	93	0.16	1.9

These limits are based on maximum material processed, an emission rate of 0.00133 tons of PM generated per ton of material processed (factor generated based on total weight of material processed, 25% solid content of cardboard sludge collected, and an over all PM control efficiency of 93% using a multivane gas scrubber for dust control. Compliance with annual limits shall be determined by a running total of 12 months of data.

- c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. 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.
- 4a. 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.

- b. In addition, the Permittee shall maintain monthly records of the following items:
 - i. Name, usage, VOM content, and HAP content of all VOM-containing materials used (Lb/mo, Ton/yr, % by wt., and % by wt.);
 - ii. Quantity of material processed on each container line (tons/mo); and
 - iii. Monthly and Annual emissions of PM, VOM and single and total HAPs from the source with supporting calculations (tons/month and tons/year).
- c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five 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.
5. If there is an exceedance of 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. 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 violation and efforts to reduce emissions and future occurrences.
6. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system 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 Ernie Kierbach at 217/782-2113.

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

DES:ELK:lsm

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the five container productions lines 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 for 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 Unit</u>	E M I S S I O N S (Tons/Year)					Single <u>HAP</u>	Total <u>HAPs</u>
	<u>CO</u>	<u>NOx</u>	<u>PM</u>	<u>SO2</u>	<u>VOM</u>		
Container Production lines			1.9		24.5		
Totals			1.9		24.5	< 10	< 25

ELK:lsm

Attachment B - Emission Units

<u>Description</u>	<u>Designation</u>
Mandrel Spiral Winder #1	M-1
Mandrel Spiral Winder #2	M-2
Mandrel Spiral Winder #3	M-3
Mandrel Spiral Winder #4	M-4
Mandrel Spiral Winder #5	M-5
Beading Unit #1	B-1
Ducon particulate control device	DCN-1