

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

International Paper
Attn: EHS Manager
6850 West 62nd Street
Chicago, Illinois 60638

<u>Application No.:</u> 99020084	<u>I.D. No.:</u> 031600CLI
<u>Applicant's Designation:</u>	<u>Date Received:</u> February 18, 2003
<u>Subject:</u> Corrugated and Solid Fiber Boxes Manufacturing Plant	
<u>Date Issued:</u> April 4, 2003	<u>Expiration Date:</u> December 31, 2004
<u>Location:</u> 6850 West 62nd Street, Chicago 60638	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of seven flexographic printing/cutting/folding/gluing presses, one corrugator/coater, starch handling system controlled by bag filter, adhesive mixing system and one boiler 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 requirements 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 for this location.
2. This permit is issued based upon the flexographic printing presses not being subject to the VOM control requirements of 35 Ill. Adm. Code Part 218 Subpart H: Printing and Publishing, Section 218.401: Flexographic and Rotogravure Printing. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit of VOM to less than 25 tons per year from the subject sources.
3. Operations and VOM emissions shall not exceed the following limits:
 - a. Printing operations:

VOM emissions - 1.0 tons/month, 11.4 tons/year

VOM emissions shall be calculated using the following equation:

$$E = 3 I \times V_i + 3 S \times V_s,$$

Where:

E - VOM emissions (tons)

I - Ink usage (tons)

V_i - VOM content of inks (fraction)

S - Cleaning solvent usage (tons)

V_c - VOM content of solvent (fraction)

b. Coating operations:

VOM content of the coating shall not exceed 2.3 lb/gal of coating (minus water and any compounds which are specifically exempted from the definition of VOM)

VOM emissions - 0.2 tons/month, 1.5 tons/year

VOM emissions shall be calculated using the following equation:

$$E = 3 C \times V_c + 3 S \times V_s,$$

Where:

E - VOM emissions (tons)

C - Coating usage (tons)

V_i - VOM content of coating (fraction)

S - Cleaning solvent usage (tons)

V_s - VOM content of solvent (fraction)

c. Adhesive mixing, gluing and miscellaneous operations:

VOM emissions - 0.5 tons/month, 5.9 tons/year

VOM emissions shall be calculated using the following equation:

$$E = 3 R_i \times V_R,$$

Where:

E - VOM emissions (tons)

R - VOM-containing raw materials usage (tons)

V_R - VOM content of raw materials (fraction)

These limits define the potential emissions of the VOM and are based on the maximum actual emissions determined from the maximum production capacity and VOM content of raw materials. 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.

4. The emissions of 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 by rule which would require the Permittee to obtain a Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.

5. Operation and emissions of the boiler shall not exceed the following limits:

Natural Gas Consumption: 15 mmscf/mo, 170 mmscf/yr

<u>Pollutant</u>	<u>Emission Factor</u> (Lb/mmscf)	<u>Emissions</u>	
		(Ton/Mo)	(Ton/Yr)
Nitrogen Oxide (NO _x)	100	0.75	8.5
Carbon Monoxide (CO)	84	0.63	7.1
Volatile Organic Material (VOM)	5.5	0.05	0.5

These limits are based on the maximum firing rate and standard AP-42 emission factors for natural gas combustion. 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.

6. This permit is issued based on negligible emissions of particulate matter from the starch handling and adhesive mixing systems. For this purpose emissions from each emission source shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 ton/year.

7. No person shall cause or allow the emission, into the atmosphere, of PM₁₀ from any process emission source to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period pursuant to requirements of 35 Ill. Adm. Code 212.324(b).

8. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.

9. The Permittee shall maintain monthly records of the following items:
 - a. Names and amounts of inks, glues and other VOM containing materials used (tons/mo);
 - b. VOM and HAP content of materials in item (a)(wt %);
 - c. VOM and HAP emission calculations (ton/mo, ton/yr); and
 - d. Natural gas consumption (mmscf/mo).
10. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and 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 the Illinois EPA request for records during the course of a source inspection.
11. 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, a description of the exceedances or violation, and efforts to reduce emissions and future occurrences.
12. 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 Illinois EPA
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 Illinois EPA
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

13. The Permittee shall submit the following additional information with the Annual Emission Report, due May 1st of each year: annual ink, coating, adhesive, clean up solvent usage from the prior calendar year.

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It should be noted that this permit has been revised to reflect replacement of one printing press with one printing/gluing press described in construction permit 03020038 without any increase in VOM emissions. This revision does not relax monitoring, recordkeeping, or reporting requirements contained in federally enforceable conditions of this permit. These permit conditions assure that this source would not be a major source for purpose of CAAPP.

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

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

DES:VJB:psj

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Corrugated Fiber Boxes Manufacturing Facility 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., 25 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 material is handled, and control measures are more effective than required in this permit.

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b. Coating operations:

VOM content of the coating shall not exceed 2.3 lb/gal of coating (minus water and any compounds which are specifically exempted from the definition of VOM)

VOM emissions - 0.2 tons/month, 1.5 tons/year

c. Adhesive mixing, gluing and miscellaneous operations:

VOM emissions - 0.5 tons/month, 5.9 tons/year

2. Emissions from the boiler shall not exceed the following limits:

Natural Gas Consumption: 15 mmscf/mo, 170 mmscf/yr

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
	<u>(Lb/mmscf)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
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3. This permit is issued based on negligible emissions of particulate matter from the starch handling and adhesive mixing systems. For this purpose emissions from each emission source shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 ton/year.

4. The emissions of 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 by rule which would require the

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Permittee to obtain a Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.

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