

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
General Packaging Products, Inc. for a Federally
Enforceable State Operating Permit (FESOP) REVISION for
1700 South Canal Street
Chicago, Illinois 60616

Site Identification No.: 031600BTT
Application No.: 95050166

Illinois EPA Contacts

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I. INTRODUCTION

General Packaging Products, Inc. has applied for a revision to the Federally Enforceable State Operating Permit (FESOP) for its printing plant. 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. General Packaging Products is currently operating under a FESOP permit. Due to the Chicago Non-Attainment area becoming a moderate non-attainment for ozone a CAAPP permit is no longer needed for General Packaging Products.

II. SOURCE DESCRIPTION

General Packaging Products, Inc. produces flexible packaging, such as candy wrappers, for the food industry. General Packaging Products, Inc. operates a rotogravure printing press and flexographic printing presses with waxers and associated slitting equipment in support of these. The printing inks and solvents 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).

The revision to the permit increases VOM emissions on press W17 and decreases VOM emissions on presses W19, W35, and W14. This results in no overall increase in VOM emissions.

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 been operating this plant under a FESOP permit. 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. The source is now applying for a FESOP revision. 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. 35 Ill. Adm. Code 218.401(b)(2) requires flexographic and rotogravure printing presses in the Greater Chicago Area to limit the VOM content of all inks used. The weighted average VOM content of all inks used shall be 25% VOM by volume of the volatile content in the ink. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

V. CONTENTS OF THE PERMIT

The revised permit that the Illinois EPA is proposing to issue would continue to 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.) These limitations are consistent with the historical operation of emission units at the plant.

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 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.