

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
CTI Industries Corporation for a  
Federally Enforceable State Operating Permit (FESOP)  
22160 North Pepper Road  
Barrington, Illinois 60010

Site Identification No.: 097803AAB  
Application No.: 95090158

Illinois EPA Contacts

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**I. INTRODUCTION**

CTI Industries Corporation has applied for a Federally Enforceable State Operating Permit (FESOP) renewal for its commercial printing facility at 22160 North Pepper Road in Barrington. This facility 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 renew for the facility. 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**

CTI Industries Corporation operates a printing facility that manufactures and prints on balloons, packaging film, and banners. They have two flexographic printing presses, a plate making operation, and two laminators/coaters. Raw materials nylon and polyethylene are bonded together with a water based adhesive on a laminator/extruder to create packaging film, balloon film, and banners. The two flexographic presses then print on the film and banner. Inks and cleaning solvents are used in normal printing operation conditions.

The principal air contaminant emitted from the printing operation is volatile organic material (VOM) which is generated during ink and clean up solvent handling/usage throughout the printing and cleaning processes. Emissions of VOM from the printing operation are vented to the atmosphere.

The principal air contaminant emitted from the plate making operation is volatile organic material (VOM) which is generated during the handling and usage of washout solvent. Emissions of VOM from the plate making operation are vented to the atmosphere.

**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. This source is performing flexographic printing. Flexographic printing is subject to 35 Ill. Adm. Code 218.401 which requires coatings and inks to contain no more than forty percent VOM by volume of the coating and ink. However, this facility prints flexible packaging and in this case inks and coatings are required not to exceed 0.16 lb of VOM per lb of ink or coating applied. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

**V. CONTENTS OF THE PERMIT**

The permit that the Illinois EPA is proposing to issue 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 would also set limitations on monthly and annual volatile organic material usage. Since this item is limited, therefore the air emissions are limited.

The permit conditions 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 renewal 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.

DWH:psj