

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
1021 North Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506
217/782-2113

Project Summary for an Application from
Greif Bros. Corporation for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
a Fiber Drum Manufacturing Operation in
Naperville, Illinois

Site Identification No.: 043467AAA
Application No.: 97070044

Important Dates:

Comment Period Begins: June 6, 2006
Comment Period Closes: July 6, 2006

Illinois EPA Contacts:

Permit Analyst: Jason Schnepf
Community Relations Coordinator: Brad Frost

PROJECT SUMMARY

I. INTRODUCTION

Greif Bros. Corporation (“Greif”) has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its fiber drum manufacturing operation in Naperville. This plant requires an air pollution control operating permit because it is a source of emission. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before renewing 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 it would propose to issue.

II. SOURCE DESCRIPTION

Greif manufactures fiber drums by winding sheets of Kraft paper around a mandrel. The emission units at this plant that require an operating permit include a drum painting operation, printing operations, caulk applicator, and QC Test process. These units are sources of emissions because the coatings and volatile materials used contain organic solvents (and/or HAP), which are emitted to the atmosphere during the coating, printing and QC Test process.

III. GENERAL DISCUSSION

FESOPs are federally enforceable, that is, the terms and conditions of FESOPs 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 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 to 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. Emissions of other pollutants, e.g., (volatile organic material, particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide) from the plant have potential emissions which are small enough that no additional restrictions are necessary to avoid being a major source of these pollutants.

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 sources of volatile organic material in the greater Chicago area. The conditions of this permit are intended to ensure that the source will comply with all applicable Board standards.

V. CONTENTS OF PERMIT

The renewed 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. As explained, the drum coating applicator and printing operation are subject to 35 IAC 218.204(c), which limits coatings to less than 2.3 pounds of VOM per gallon of coating. 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 the amount of VOM used at this plant. These limitations are consistent with the historical operation and capacity of the plant.

The permit conditions would also continue to establish 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 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.