

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Aargus Plastics, Inc. for  
Construction Permit and Federally Enforceable State Operating Permit (FESOP) for  
Flexographic Printing Plant  
Wheeling, Illinois

Site Identification No.: 031497AAN  
Application Nos.: 07060055 & 03020085

Schedule

Public Comment Period Begins: March 13, 2008  
Public Comment Period Closes: April 12, 2008

Illinois EPA Contacts

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## **I. INTRODUCTION**

Aargus Plastics, Inc. has applied for a Construction and Federally Enforceable State Operating Permit (FESOP) for its Flexographic Printing plant located in Wheeling, Illinois. This plant requires an air pollution control operating permit because it is a source of emissions to the atmosphere. The Illinois EPA has prepared drafts of the construction and operating permits that it proposes 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 including the terms and conditions of the draft permits that it would propose to issue.

## **II. SOURCE DESCRIPTION**

Aargus Plastics is a manufacturer of plastic bags that prints bag designs using the flexographic printing process. The emission units at this plant that require construction and operating permits include seventeen flexographic printing units with natural gas dryers. The flexographic printing operations are sources of emissions because printing materials contain solvents (Volatile Organic Material) that are released during the printing and drying process. The natural-gas-fired equipment emits by-products of combustion.

## **III. GENERAL DISCUSSION**

Construction permits and 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 is requesting a construction permit due to a change in roller configuration on the blown film extrusion lines that will result in an increase in printing line speed, resulting in an increase to the material usage and emissions.

The source is requesting to operate 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 volatile organic material (VOM), 10 tons for individual Hazardous Air Pollutant ants (HAP) and 25 tons for combined HAP.

## **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 application shows that the plant is in compliance with applicable state and federal emission standards.

The emissions of VOM are also restricted below 25 tons per year to exclude the source from requirements of the non-attainment area Reasonable Available Control Technology requirements. The HAP emissions are restricted below 10 tons per year for individual HAP and 25 tons per year for combined HAP to exclude the source from requirements of the federal NESHAP for flexographic printing.

## **V. CONTENTS OF THE PERMITS**

The construction and operating permits that the Illinois EPA is proposing to issue identifies the specific emission standards that apply to the emission units at the plant. The conditions of the permits are intended to ensure that the source continues to comply with applicable emission standards.

The permits would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permits 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 permits would also set limitations on the VOM from the plant to below 25 tons per year. These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions would also continue to 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 permits 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 a Construction Permit and a Federally Enforceable State Operating Permit. The Illinois EPA is therefore proposing to issue the permits.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permits. 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.