

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Rock-Tenn Company Incorporated for a  
Federally Enforceable State Operating Permit (FESOP) Renewal  
for 705 North Farnsworth Avenue and 1601 East Mountain Street  
Aurora, Illinois

Site Identification No.: 089800AAT  
Application No.: 72111317

Schedule

Public Comment Period Begins: November 8, 2012  
Public Comment Period Closes: December 8, 2012

Illinois EPA Contacts

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**I. INTRODUCTION**

Rock-Tenn Company has applied for a Federally Enforceable State Operating Permit (FESOP) renewal for its paperboard manufacturing facility is located at 705 North Farnsworth Avenue and 1601 East Mountain Street, Aurora, Kane County. 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.

**II. SOURCE DESCRIPTION**

Rock-Tenn Company is a recycled paperboard mill that manufactures paperboard from 100% recycled paper stock for use in hardback book covers and other packaging/shipping materials.

The source operates a paperboard mill comprised of the following emission units and/or pollution control equipment: a paper making process consisting of: natural gas-fired dryer, natural gas-fired generators, natural gas-fired boilers, and adhesive process.

The NO<sub>x</sub> and CO are admitted to the atmosphere from the combustion of natural gas in the dryer, engine/generator, boiler, and paper making process. VOM is generated from the chemicals used in the paper making process and the adhesive application process.

**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.

This facility has requested to operate under a FESOP because the actual emissions of the facility are below the levels at which the facility would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the facility's potential emissions would be such that the facility would be considered a major source. The permit acts to restrict the facility potential emissions so that it is not considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the facility, as would otherwise be required.

The FESOP limits the operation and annual emissions of the facility to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. The potential emissions

of other pollutants (e.g., particulate matter and sulfur dioxide) from the plant are small enough that no restrictions are needed 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 standards for sources of Nitrogen oxides (NO<sub>x</sub>), Volatile Organic Material, Particulate Matter (PM<sub>10</sub>), and Carbon Monoxide (CO) emission. The application shows that the plant is in compliance with applicable state and federal emission standards.

**V. CONTENTS OF THE PERMIT**

The FESOP permit that the Illinois EPA is proposing to issue would identify specific emission standards that apply to the emission units at the facility. 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 facility is operated as a non-major source. The permit would limit the operation and annual emissions of the facility 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 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 facility is being operated within the limitations set by the permit and the facility'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 this 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.

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