

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Packaging Corporation of America for a
Federally Enforceable State Operating Permit (FESOP) and for
a Construction Permit
5200 West Roosevelt Road
Chicago, Illinois 60644

Site Identification No.: 031600GWT
Application No.: 10050006

Illinois EPA Contacts
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I. INTRODUCTION

Packaging Corporation of America has applied for a Federally Enforceable State Operating Permit (FESOP) and a Construction Permit for its packaging plant at 5200 West Roosevelt Road in Chicago. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of both permits that it would propose to issue for the plant. However, before issuing the permits, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permits that it would propose to issue.

II. SOURCE DESCRIPTION

Packaging Corporation of America is a packaging (custom and stock) and point-of-purchase display manufacturer of corrugated and solid fiber boxes. To this end, the facility purchases corrugated and solid fiber sheets of various sizes, then prints, coats, die-cuts, laminates, folds, glues, and prepares for shipment to customers a variety of set-up-display modules.

The following processes are utilized, which have potential to emit regulated pollutants.

1. Flexographic printing and coating operations;
2. Adhesive and gluing operations, i.e., laminating and seam gluing;
3. Die cutting.

Flexographic printing and coating operations are used to print words and pictures on blank corrugated or solid fiber sheets. These blanks are also die-cut to provide slots, windows and other cutouts, then typically folded and a manufacturer's seam made by applying glue along one edge.

Alternately, a pre-printed label is applied to the blank, which is then die-cut, slotted, folded and glued. The pre-printed label is typically applied by applying a thin layer of glue to the label, then pressing it to the carton blank of appropriate size and shape.

The construction permit is for one flexographic printer/slotter, one flexographic gluer/printer and one folder/gluer.

The printing inks, glues and adhesives 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).

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. 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 ink, coating and glue oil usage. Since these items are 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 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.