

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

**BUREAU OF AIR**

**DIVISION of AIR POLLUTION CONTROL**

**PERMIT SECTION**

PROJECT SUMMARY for the  
DRAFT TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Clear Lam Packaging, Inc.  
1950 Pratt Boulevard  
Elk Grove Village, IL 60007

Permit Engineer/Technical Contact: Dan Punzak, 217/782-2113

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Springfield, Illinois

## I. INTRODUCTION

This source has applied for a renewal of its Title V - Clean Air Act Permit Program (CAAPP) operating permit (I.D. 031440AHX, Permit #95090246) for its existing operation. The CAAPP is the program established in Illinois for operating permits for significant stationary sources as required by the federal Clean Air Act, as amended in 1990, and 40 CFR Part 70. Unlike state operating permits, the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA. This document is for informational purposes only and does not shield the Permittee from enforcement actions or its responsibility to comply with applicable regulations. This document shall not constitute a defense to a violation of the Act or any rule or regulation.

A Title V permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits, appropriate compliance procedures, and specific operational flexibility. The appropriate compliance procedures may include monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

The laminating operation will be subject to a NESHAP for Paper and Web Coating, 40 CFR 63 Subpart JJJJ. However, the emission units that will be subject are already vented to an capture and control system (thermal oxidizer) that meets the requirement for the Printing NESHAP, Subpart KK, and therefore the units are already in compliance with the new requirements.

## II. SOURCE DESCRIPTION INFORMATION

### a. Location and nature of business

The source manufactures flexible packaging materials for food and consumer products. The primary emission units at the source include laminating operations and flexographic printing. In addition, there are storage tanks for inks, adhesives and solvents.

### b. National Ambient Air Quality Standard status for this area

This source is located in an area that is in non-attainment of the National Ambient Air Quality Standards for ozone and PM<sub>2.5</sub> and attainment for all other pollutants.

### c. Major source status

The proposed permit is based on:

1. The source requiring a CAAPP permit as a major source of VOM and HAP emissions.

d. Significant emission units

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Laminator Line L-1	1987	Reeco Thermal Oxidizers 1 & 2 and Concentrator/Oxidizer
	Laminator Line L-2	Pre-1985	
	Laminator Line L-3	Pre-1985	
	Laminator Line L-4	Pre-1985	
	Flexographic Press FP-1	Pre-1985	
	Flexographic Press FP-4	1987	
	Flexographic Press FP-5	1987	
	Flexographic Press FP-6	1995	
	Flexographic Press FP-7	1995	
	Flexographic Press FP-8	1995	
	Flexographic Press FP-9	2000	
Flexographic Press FP-10	2002		
02	Storage Tanks	----	Submerged Loading

## III. EMISSIONS INFORMATION

The proposed permit limits the source wide maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source-wide limit. Further unit specific emission unit limitations are found within Sections 5 and 7 of the proposed permit.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	147.0
Sulfur Dioxide (SO <sub>2</sub> )	0.053
Particulate Matter (PM)	0.89
Nitrogen Oxides (NO <sub>x</sub> )	8.42
Hazardous Air pollutant (HAP), not included in VOM or PM	0
Total	156.363

This proposed permit contains terms and conditions that address the applicability, and, if determined applicable, substantive requirements of Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the proposed permit by T1, T1R, or T1N. Any conditions established in a construction permit [T1] pursuant to Title I and not revised or deleted in this proposed permit, remain in effect pursuant to Title I provisions

until such time that the Illinois EPA revises or deletes them. Where the source has requested that the Illinois EPA establish new [T1N] or revise [T1R] such conditions in a Title I permit, those conditions are consistent with the information provided in the Title V application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

This proposed permit does not establish any new [T1N] requirements or revised [T1R] requirements.

This proposed permit does establish newly revised [T1R] requirements.

#### IV. EMISSIONS CONTROL PROGRAMS INFORMATION

##### Emissions Reduction Market System (ERMS)

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the proposed permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the proposed permit. The proposed permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions.

#### V. COMPLIANCE ASSURANCE MONITORING (CAM) PLAN INFORMATION

The Compliance Assurance Monitoring (CAM) plan is a program for pollutant-specific emission units which use an add-on control device to achieve compliance with an emission limitation or standard, has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than major source threshold levels, and is not specifically exempt by 40 CFR Part 64. There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

#### VI. OTHER PERTINENT INFORMATION

##### a. Fugitive Particulate Matter Operating Program

The fugitive operating program is intended to significantly reduce fugitive particulate matter emissions within certain affected locations and facilities in Illinois. The source is subject to the fugitive operating program for particulate matter. Normally, affected operations by this program include, but are not limited to, addressing normal traffic pattern roads, parking facilities, and material piles

and handling. Usually a source addresses the programs through the use of water, oils, or chemical dust suppressants.

b. Risk Management Plan (RMP)

A risk management plan (RMP) is a program required for a source affected by Chemical Accident Prevention for reducing the levels of emissions during an emergency, consistent with safe operating procedures. If the Permittee becomes subject to the RMP then the Permittee would be required to immediately implement the appropriate steps described in this plan should an emergency be declared. The Permittee then would be required to maintain and have this plan on file with the Illinois EPA.

c. Episode Action Plan (EAP)

An episode action plan (EAP) is a program for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Permittee is required to immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared. The Permittee is required to maintain and have this plan on file with the Illinois EPA.

d. PM<sub>10</sub> Contingency Measure Plan

If the Permittee becomes subject to a contingency measure plan then the Permittee will be required to prepare and submit a contingency measure plan reflecting the PM<sub>10</sub> emission reductions. Such plan will be incorporated by reference into the proposed permit and shall be implemented by the Permittee.

## VII. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source.

## VIII. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a Title V permit. The Illinois EPA is therefore proposing to issue a Title V permit, subject to the conditions proposed in the draft permit.

Comments are requested by the Illinois EPA for the proposed permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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