

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
RENEWAL

PERMITTEE

Bell Packaging Corporation
d/b/a Visy Packaging
Attn: Patrick Macke
300 West 170th Street
South Holland, Illinois 60473

Application No.: 74120092

I.D. No.: 031297AAL

Applicant's Designation:

Date Received: July 30, 1999

Subject: Packaging Plant

Date Issued:

Expiration Date:

Location: 300 West 170th Street, South Holland

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a Superior boiler, one corrugator, one corn starch silo with baghouse, one baler/cyclone, one general gluer (#160), one Tanabe gluer (#154), one Langston letter press (#124), two Ward flexopresses (#130, #131), one Hycor flexo press (#134), one Langston flexo press (#143), and one Martin flexo press (#140) pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons per year of volatile organic material, 10 tons per year of any single HAP, 25 tons per year of total HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. Operation of the flexographic and letter press printing presses and corrugator shall not exceed the following limits:

<u>Item of Equipment</u>	<u>VOM Usage (Ton/Month)</u>	<u>VOM Emissions (Ton/Year)</u>
Inks, Coatings, Adhesives (total)	2.4	24.0

These limits define the potential emissions of the printing presses and are based on maximum annual pressroom material usage and maximum volatile organic material content of the inks, coatings and adhesives.

3. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 4a. Within 30 days of a written request from the Illinois EPA or USEPA the Permittee shall submit data on the volatile organic material content of representative inks, solvents, and coatings as applied, determined by laboratory analysis in accordance with the 35 Ill. Adm. Code Section 218.105.
- b. The submitted data shall include the VOM content of the inks, solvents and coatings, a justification of why these are representative, and a description of the sampling procedures and documentation for the analysis.
- c. The Illinois EPA may provide additional time for the performance of this testing upon request from the Permittee which shows that it is not feasible to perform representative testing within 30 days.
5. This permit is issued based on the use of natural gas for the Superior boiler. Use of any other fuel will require a revised permit.
- 6a. Emissions and operation of the gas fired boiler shall not exceed the following limits:

Item of <u>Equipment</u>	Firing Rate <u>(mmBtu/Hr)</u>	Carbon Monoxide Emissions		Nitrogen Oxides Emissions	
		<u>(Lb/Hr)</u>	<u>(Ton/Yr)</u>	<u>(Lb/Hr)</u>	<u>(Ton/Yr)</u>
Boiler	10.0	0.8	3.6	1.0	4.3

These limits are based on standard emissions factors for natural gas and the maximum operating hours (8,736 hours/yr).

- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

7. Emissions and operations of the following items shall not exceed the following:

<u>Emission Unit</u>	<u>Particulate Matter Emissions</u>	
	<u>(Lb/Hour)</u>	<u>(Ton/Year)</u>
Corn Starch Silo	0.5	0.02
Baler/Cyclone	0.7	3.10

The emissions from the silo are based on the capture and control efficiency of a baghouse (99%) with emissions occurring during loading and unloading at maximum hours of operation (75 hr/yr). The emissions from the baler/cyclone is from the maximum emissions given at the maximum hours of operation (8,736 hr/yr). Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

8. The Permittee shall maintain monthly records of the following items:

- a. The name and identification number of each coating and ink as applied on each printing line.
- b. Usage of all inks, coatings, solvents and adhesives (ton/month and ton/year).
- c. VOM and HAP content of all inks, coatings, solvents, and adhesives as applied on each coating line (lb/gallon).
- d. Emissions of VOM and HAPs (ton/month and ton/year).
- e. Natural gas consumption (mmscf/month and mmscf/yr).
- f. Maintenance and operating logs for the cyclone and baghouse control systems, including operating data.

9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

11. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

12. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: annual ink, solvent, coating and adhesive usage from the prior calendar year. If there have been no exceedances during the prior year, the Annual Emissions Report shall include a statement to that effect.
13. Should any modifications at the source increase the total emissions of volatile organic material or hazardous air pollutants to more than 25 tons/yr, the Permittee shall be required to obtain a construction permit to justify the emission increase.

If you have any questions on this, please call Nathan Frank at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:NAF:jar

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from this packaging plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 10 tons per year of any single HAP, and 25 tons per year of all HAPs combined, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

1. Emissions from the printing presses and corrugator:

<u>Item</u>	<u>VOM Usage (Ton/Month)</u>	<u>VOM Emissions (Ton/Year)</u>
Inks, Coatings, Adhesives (Total)	2.4	24.0

These limits define the potential emissions of the printing presses and are based on maximum annual pressroom material usage and maximum volatile organic material content of the inks, coatings and adhesives.

2. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
3. Emissions from fuel combustion:

<u>Firing Rate (mmBtu/hr)</u>	<u>Pollutant</u>	<u>Emission Rate (lb/10⁶ ft³)</u>	<u>Annual Emissions (Ton/Yr)</u>
10.0	NO _x	100	4.3
	CO	84	3.6

These limits are based on standard emissions factors for natural gas and the maximum operating hours (8,736 hours/yr).

4. Emissions of particulate matter:

<u>Emission Unit</u>	<u>Particulate Matter Emissions</u>	
	<u>(Lb/Hour)</u>	<u>(Ton/Year)</u>
Corn Starch Silo	0.5	0.01
Baler/Cyclone	0.7	3.10

The emissions from the silo are based on the capture and control efficiency of a baghouse (99%) with emissions occurring during loading and unloading at maximum hours of operation (75 hr/yr). The emissions from the baler/cyclone is from the maximum emissions given at the maximum hours of operation (8,736 hr/yr).

NAF:jar