

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for a
Revised Construction Permit Application from
Graphic Packaging International, Inc. for
Two Lithographic Presses and Coating Units
at Its Existing Facility in
Carol Stream, Illinois

Site Identification No.: 043020AAC
Permit No.: 11080040

Illinois EPA Contacts

Permit Analyst: Jason Schnepf
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Important Dates:

Application Received: June 26, 2013
Public Comment Period Begins: July 12, 2013
Public Comment Period Closes: August 11, 2013

I. INTRODUCTION

Graphic Packaging International, Inc. (GPII) manufactures folding cartons. On October 12, 2011, GPII was issued a construction permit for installation of two new lithographic presses (Press #6 and #7) each with a flexographic coating unit¹. The construction permit relied upon the shutdown of existing Press #4 so that the net increase in emissions of volatile organic material (VOM) would not be significant. GPII has now requested a revision of this permit to allow Press #3 to be shut down instead of Press #4. The permit would continue to rely on the existing shut down of another existing press, Press #9.

The Illinois EPA has reviewed the request and made a preliminary determination that it meets applicable requirements. Accordingly, the Illinois EPA has prepared a draft of the revised air pollution control construction permit that it would now propose to issue for this project. However, before issuing this revised permit, the Illinois EPA is holding a public comment period to receive written comments on the proposed issuance of this revised permit and the terms and conditions of the draft of the revised permit.

II. PROJECT DESCRIPTION

This project involves installation of two new lithographic presses (Press #6 and #7) each with a flexographic coating unit. The presses will apply inks and coatings to paperboard for cartons. In addition to printing inks, fountain solutions, cleaning solvents and solutions are used. The presses will also include a flexographic coating unit. The flexographic coating units will apply a water-based coating after the printing process. Hot air knives and an infrared dryer will dry the coatings.

As part of this project, GPII is relying on decreases in emissions of volatile organic material (VOM) at certain existing equipment. The existing equipment has either been removed from the site or will be decommissioned as the new presses are installed and achieve normal operation.

III. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with Illinois Pollution Control Board emission standards. The Board's emission standard represents the basic requirements for sources in Illinois.

¹ GPII was previously issued another permit install Press #6 and #7 (Permit No. 09090006 issued November 2009). Construction never commenced under that permit and it expired.

For the new printing lines, the Permittee would be required to comply with the established requirements for lithographic printing presses, as identified in the source's CAAPP permit. In particular, the new presses would be subject to 35 IAC Part 218 Subpart H: Printing and Publishing, which requires use of low VOM content fountain solutions and cleaning solvents. The coating units on each press would be required to comply with 35 IAC 218.301, Use of Organic Material, which limits emissions of photochemically reactive organic material emissions to no more than 8 pounds per hour if add-on control is not used.

IV. EVALUATION OF THE CHANGE IN EMISSIONS

This project is not a major project for purposes of Major Stationary Sources Construction and Modification (MSSCAM), 35 IAC Part 203, also known as Nonattainment New Source Review. In particular, GPII chose to address the net change in VOM emissions at the source. This evaluation involves summing all creditable increases and decreases for the project as well as other increases and decreases that have occurred over the contemporaneous² time period.

The current construction permit is based on a permanent shut down of Press #4, which would provide a contemporaneous decrease of 6.4 tons VOM/year. With the requested revision, GPII is instead proposing to permanently shut down Press #3, which would provide a contemporaneous decrease of only 2.0 tons VOM/year. However, the results of this evaluation show that the net changes in emissions for this project will still be less than significant, i.e., an increase of only 34.8 tons/year compared to the 40 tons/year significant emission rate for VOM. Thus, this project would not be a major modification. A summary of this evaluation follows:

VOM Netting Analysis (Tons/Year)

	Date	Permit	VOM
Project Emissions Increase	Est. 2011-2013	11080040	41.6
Contemporaneous Increases			
Gluer	9/2008	08080035	0.1
Gluer	9/2009	09050056	0.1
Increases Subtotal			0.2
Contemporaneous Decreases			
Shutdown Lithographic Press #3	Est. 2013	11080040	2.0
Shutdown Rotogravure Press #9	8/2009	11080040	5.0
Decreases Subtotal			7.0
NET EMISSIONS CHANGE			34.8
Significance Threshold			40
Greater Than Significant			No

²The contemporaneous time period begins August 16, 2006.

V. CONTENTS OF PERMIT

The revised permit would continue to contain appropriate conditions for implementation of the applicable state standards for VOM emissions from the new presses. These standards require testing, monitoring, recordkeeping, and reporting to verify compliance.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this application for revision of the construction permit meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft of the revised permit. Comments are requested by the Illinois EPA on this proposed issuance of a revised permit for the proposed project.

JMS:11080040: