

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Weyerhaeuser Company
Attn: Ken Stevenson
4400 South 45th Street
Chicago, Illinois 60632

Application No.: 73120075 I.D. No.: 031600EKJ
Applicant's Designation: CN05-748 Date Received: February 14, 2001
Subject: Manufacturing of Corrugated Containers
Date Issued: April 4, 2001 Expiration Date: April 3, 2006
Location: 4400 West 45th Street, Chicago

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of two detergent wash booths (WB1 and WB2), one corrugator (C1), two rotary die cutters (DC1 and DC2), two flexographic printers-slotter folder gluers (PSFG 1 and 4), two Bobst die cutters (DC4 and 5 (DC4 with a 2-color print station (one Koppers flexographic printer))), one collector (air conveying system), one starch storage silo with baghouse (SS1 and H1), and one 20.9 mmBtu/hr Cleaver Brooks boiler 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 VOM). 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.
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.
- 3a. The 20.9 mmBtu/hr natural gas fired boiler (E1) is subject to a New Source Performance Standard (NSPS) for small steam generators, 40 CFR 60, Subparts A and Dc. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

- b. At all times, the Permittee shall also, to the extent practicable, maintain and operate the 20.9 mmBtu/hr natural gas fired boiler, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.

- 4a. Emissions and operation of the Cleaver Brooks boiler shall not exceed the following limits:

Natural Gas Usage (Therms/Year)	VOM Emissions (Lb/Hr)	Limit (Tons/Yr)	NO _x Emissions (Lb/Hr)	Emissions (T/Yr)	CO Emissions (Lb/Hr)	(Tons/Yr)
1,830,840	8	0.49	4.97	25.5	1.46	6.4

These limits are based on Permittee request to keep VOM emissions below major source threshold (i.e., 25 tpy VOM). Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas shall be the only fuel fired in the Cleaver Brooks boilers.
- 5a. Emissions and operation of the corrugator (C1), Koppers flexographic printer (P1), four die cutters (DC1, 2, 4, and 5), and two flexographic printer-slotter folders (PSFG 1 and 4) shall not exceed the following limits:

Material Used	Maximum Material Usage	Maximum VOM	VOM Emissions	
		Content (Wt. %)	(Tons/Mo)	(Tons/Yr)
Inks		25	1.2	13.55
Adhesives	30,000 lbs/yr	1	0.013	0.15
Paper	2.1 x 10 ⁹ ft ² /yr	7.6 x 10 ⁻⁶	0.7	7.98

These limits are based on Permittee request to keep facility wide VOM emissions below the major source threshold. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. This permit is issued based on no increase in the use of clean-up solvents from the replacement of die cutter DC2 with a new rotary die cutter with flexographic printing.
- c. Pursuant to 218.401(a)(2), the Permittee, shall not apply at any time any coating or ink with a VOM content which exceeds twenty-five percent VOM by volume of the volatile content in the coating and ink as determined through the applicable coating or ink analysis test methods and procedures specified in Section 218.105.
- 6. Emissions and operation of the scrap handling system and starch silo shall not exceed the following limits:

<u>Material</u>	Maximum	PM Emissions	
	<u>Material Usage</u> (Lb/Hr)	(Lb/Hr)	(Ton/Yr)
Scrap Corrugated Board	6,030	6	27.8
Starch Silo	1,247	1.3	5.5

These limits are based on maximum material throughput, mass balance, facility supplied emission test results and maximum operating hours of 8,760 hr/yr. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 7a. The Permittee shall collect and record all of the following information each month and maintain the information at the source for a period of three years:
 - i. The name and identification number of each coating and ink as applied on all printing lines.
 - ii. The VOM content of each coating and ink as applied.
 - iii. Total HAP emissions from all processes.
- b. The Permittee shall fulfill the applicable notification and recordkeeping requirements of 40 CFR 60.7 and 60.48c for the boiler including the following:
 - i. Records of the amounts of each fuel combusted during each day (40 CFR 60.48c(g)).
8. 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 and 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 request for records during the course of a source inspection.
9. 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 Unit 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.
10. 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
9511 West Harrison
Des Plaines, Illinois 60016

- 11a. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
- i. The name and identification number of each coating and ink as applied on all printing lines.
 - ii. The VOM content of each coating and ink as applied on all printing lines.
 - iii. The quantity of adhesives used (tons/month, tons/year).
 - iv. The quantity of each ink used (tons/month, tons/year).
- b. These records shall be retained on site and shall be made available for inspection by the Illinois EPA upon request.

Please note that die cutter DC2 has been replaced with a new rotary die cutter with flexographic printers.

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

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

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cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
USEPA

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from manufacturing of corrugated containers 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 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 Cleaver Brooks boiler.

Natural Gas Usage (Therms/Yr)	VOM Emissions Limit		NO _x Emissions Limit		CO Emissions Limit	
	(Lb/Hr)	(Tons/Yr)	(Lb/Hr)	(Tons/Yr)	(Lb/Hr)	(Tons/Yr)
1,830,840	8	0.49	4.97	25.5	1.46	6.4

This table defines the potential emissions from the Cleaver Brooks boiler. These totals were determined by maximum operation and AP-42 emission factors.

2. Emissions from the corrugator (C1), Koppers flexographic printer (P1), two die cutters (DC1 and 4), and two flexographic printer slotter folders (PSFG 1 and 4).

Material Used	Maximum Material Usage	Maximum VOM Content (Wt. %)	VOM Emissions	
			(Tons/Mo)	(Tons/Yr)
Inks		25	1.2	13.55
Adhesives	30,000 lbs/yr	1	0.013	0.15
Paper	2.1 x 10 ⁹ ft ² /Yr	7.6 x 10 ⁻⁶	0.7	7.98

This table defines the potential emissions from the corrugator (C1), flexographic printer slotter (PS1), four die cutters (DC1, 2, 4, and 5), and four flexographic printer slotter folders (PSFG 1, 2, 3, and 4). These tables were determined by maximum operation and material VOM content.

3. Emissions from the scrap handling system and starch silo.

Material	Maximum Material Usage (Lb/Hr)	PM Emissions	
		(Lb/Hr)	(Ton/Yr)
Scrap Corrugated Board	6,030	6	27.28
Starch Silo	1,247	1.3	5.5

This table defines the potential emissions from the scrap handling system. These totals were determined by a maximum operation and standard emission factors.

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4. This permit is issued based on negligible emissions of PM from the starch silo with baghouse control. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

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