

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT-RENEWAL

PERMITTEE

Weyerhaeuser Company  
Attn: Jim Schuhardt  
3001 Otto Street  
Belleville, Illinois 62223

Application No.: 90090035

I.D. No.: 163010AEZ

Applicant's Designation:

Date Received: November 29, 2004

Subject: Box Manufacturer

Date Issued:

Expiration Date:

Location: 3001 Otto Street, Belleville

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

- One (1) 16.8 mmBtu/Hour Natural Gas-Fired Boiler and Heating System,
- One (1) Scrap/Trim Reclamation System with 9 Pick Up Points to One (1) Cyclone,
- One (1) Water Based Glue System,
- One (1) Water Based Printing System,
- One (1) Coating System, One (1) Corrugator,
- One (1) Die Preparation Room,
- One (1) Corn Starch Storage Silo with Baghouse and
- One (1) Three-Color Flexo Folder Gluer

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., 100 tons per year of VOM, 10 tons/year for a single HAP, and 25 tons/year for totaled 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. Formatted: Bullets and Numbering

- 2. This permit is issued based upon the flexographic printing operations not being subject to the VOM control requirements of 35 Ill. Adm. Code, Part 219, Subpart H: Printing and Publishing. This is consequence of the plant-wide emissions of volatile organic materials (VOM) from flexographic printing operations being limited below applicability threshold of 100 tons per year specified in Section 219.402.
- 3. The paper coating operations performed on the printing press are subject to emission limitations of 35 Ill. Adm. Code Part 219.204(c). The VOM content of the coatings, as applied, on the printing press shall not exceed 2.3 lb/gal excluding water and any compounds which are specifically exempted from the definition of VOM.
- 4a. Emissions and operation of the heater system shall not exceed the following limits:

<u>Item of Equipment</u>	<u>(mmBtu/Hr)</u>	<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
			<u>Factor</u>	<u>(Lb/mmBtu)</u>	<u>(Tons/Hr)</u>
Clever Brooks Boiler	16.8	PM	0.007	0.055	0.55
		SO <sub>2</sub>	0.001	0.007	0.07
		CO	0.082	0.603	6.03
		NO <sub>x</sub>	0.098	0.721	7.21
		VOM	0.005	0.040	0.40

These limits are based on standard emission factors and 8,760 hours of operation (Tables 1.4-1 and 1.4-2, AP-42, Volume I, Fifth Edition, Supplement D , July 1998).

- b. Natural gas shall be the only fuel combusted in the above-referenced boiler.
- 5a. Operation and emissions of the coating and printing process (combined) shall not exceed the following limits:

← --- Formatted: Bullets and Numbering

<u>Materials</u>	<u>Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(Lbs/Mo)</u>	<u>(Lbs/Yr)</u>	<u>(%. by Wt.)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Printing Ink	20,000	240,000	15.0	3,000	18.0
Product Coatings	20,000	240,000	2.0	400	2.4
Adhesives	15,000	180,000	6.0	900	5.4
				Total	25.8

These limits are based on the maximum operating rate and the maximum VOM contents of the inks, coatings and adhesives.

- b. The VOM and HAP emissions from printing operations shall be determined from the following equation:

$$E = \Sigma(M_i \times C_i),$$

Where:

E - VOM (HAP) emissions (ton);

M<sub>i</sub> - VOM (HAP)-containing materials usage (ton);

C<sub>i</sub> - VOM (HAP) content of the materials (fraction).

- c. Emissions and operation of equipment shall not exceed the following limits:

Equipment	Throughput		Pollutant	Emission Factors (Lb/1000 Ft <sup>3</sup> )	Emissions	
	(10 <sup>6</sup> ft <sup>2</sup> /Mo)	(10 <sup>6</sup> ft <sup>2</sup> /Yr)			(Lbs/Mo)	(Tons/Yr)
Corrugator	215.0	2,580	PM <sub>10</sub>	0.00567	1,218.4	7.31
			VOM	0.00756	1,625.4	9.75

These limits are based on the maximum operating rate of the corrugator and emission factors developed through an emissions study conducted at another similar source, which is owned by the Permittee.

- 6a. Emissions and operation of equipment shall not exceed the following limits:

Process	Throughput		Pollutant	Emission Factor (Lbs/Ton)	Emissions	
	(Tons/Mo)	(Tons/Yr)			(Lbs/Mo)	(Tons/Yr)
Scrap Reclamation	4,000	48,000	PM <sub>10</sub>	0.6	2,400	14.4

These limits are based on the maximum operating rate of the scrap reclamation operation and

- b. This permit is issued based on negligible emissions of particulate matter from cornstarch storage silo. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
7. The emissions of hazardous air pollutants (HAP) 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. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements of Section 112(g) of the Clean Air Act.
8. 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 (running 12 month total).
9. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants

regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- 10a. Pursuant to 35 Ill. Adm. Code 219.211(c)(2), on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
- i. The name and identification number of each coating as applied on each coating line; and
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
- b. Pursuant to 35 Ill. Adm. Code 219.404(b)(2), the owner or operator of a printing line which is exempted from the limitations of 35 Ill. Adm. Code 219.401 because of the criteria in 35 Ill. Adm. Code 219.402 shall collect and record all of the following information each year for each printing line 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 each printing line.
  - ii. The VOM content and the volume of each coating and ink as applied each year on each printing line.

- 11a. The Permittee shall maintain monthly records of the following items:
- i. Amount of usage of inks, additives, clean-up solvents and other VOM (HAP)-containing materials used (tons/month, tons/year);
  - ii. VOM and HAP content of materials in item (a) (weight %);
  - iii. Natural gas usage, (million ft<sup>3</sup>/month and million ft<sup>3</sup>/year);
  - iv. Scrap Reclamation (tons/month, tons/year);
  - v. Corrugator throughput (ft<sup>2</sup>/month, ft<sup>2</sup>/year); and
  - vi. Monthly and annual CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAP emissions with supporting calculations (tons/month, tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) 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.
12. If there is an exceedance of or deviation from 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/deviation. 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 deviation and efforts to reduce emissions and future occurrences.
13. Two (2) copies of required reports and notifications 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  
2009 Mall Street  
Collinsville, Illinois 62234

Please note that this permit has been revised to incorporate the operation of a three-color Hamada 1000/2500 flexo folder gluer and the removal of three

Page 6

existing machines a two-color Hopper Swift tray press, a two-color koppers flexo printer, and a Bobst die cutter from Construction Permit #06030078.

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

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

DES:DLB:psj

cc: Illinois EPA, FOS Region 3  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from box manufacturing 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 below the levels, e.g., 100 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.

<u>Emission Units</u>	E M I S S I O N S (Tons/Year)						HAPs	
	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>VOM</u>	<u>PM<sub>10</sub></u>	<u>Single</u>	<u>Combined</u>
Cleaver Brooks Boiler	0.55	0.07	6.03	7.21	0.40			
Printing, Coating and Die Preparation					27.60			
Corrugator					9.75	7.31		
Scrap Reclamation						14.40		
Totals	0.55	0.07	6.03	7.21	37.80	21.71	< 10	< 25

DLB:psj