

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
1021 N. Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

Project Summary for an Application from
Fort Dearborn Company Flexible Packaging Division for a
Federally Enforceable State Operating Permit (FESOP) for
1500 Morse Avenue
Elk Grove Village, Illinois 60007

Site Identification No.: 031440ALB
Application No.: 05050048

Illinois EPA Contacts

Permit Analyst: David Hulskotter
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

Fort Dearborn Company Flexible Packaging Division has applied for a Federally Enforceable State Operating Permit (FESOP) for its printing plant located at 1500 Morse Avenue in Elk Grove Village. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the permit that it would propose to issue for the plant. However, before issuing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue. Fort Dearborn Company Flexible Packaging Division is currently operating under a CAAPP permit. Due to the Chicago Non-Attainment area becoming a moderate non-attainment for ozone a CAAPP permit is no longer needed for General Packaging Products.

II. SOURCE DESCRIPTION

Fort Dearborn Company Flexible Packaging Division produces flexible packaging products. An example of this type of product produced could be candy wrappers for the food industry. Fort Dearborn Company Flexible Packaging Division operates five flexographic printing presses with two edge seamers. The printing inks and solvents contain organic solvents which are emitted to the atmosphere during the printing process as volatile organic material (VOM). These materials also contain components that are considered hazardous air pollutants (HAPs).

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has been operating this plant under a CAAPP permit. But, because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. The source is now applying for a FESOP. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need not obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The Board has specific standards for units emitting volatile organic material in the

Greater Chicago Area. 35 Ill. Adm. Code 218.401(b)(2) requires flexographic and rotogravure printing presses in the Greater Chicago Area to limit the VOM content of all inks used. The weighted average VOM content of all inks used shall be 25% VOM by volume of the volatile content in the ink. However, the history of this plant has had their VOM emissions limited to 25 tons per year. According to 35 Ill. Adm. Code 218.402, this plant is exempt from 35 Ill. Adm. Code 218.401. The applicable rule is then 35 Ill. Adm. Code 218.301 for 8 lbs/hour of organic material. The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

The permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.) These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions would also require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for issuance of its permit. The Illinois EPA is therefore proposing to issue the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.

DWH:05050048:psj