

Division of Air Pollution Control

DES:DWH:psj

cc: Illinois EPA, FOS, Region 1
USEPA

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1.0 SOURCE IDENTIFICATION

1.1 Source

Bagcraft Corporation of America
3900 West 43rd Street
Chicago, Illinois 60632
312/254-8000

I.D. No.: 031600ACL

Standard Industrial Classification: 2643 Paper and Paperboard

1.2 Owner/Parent Company

Bagcraft Corporation of America
3900 West 43rd Street
Chicago, Illinois 60632

1.3 Operator

Bagcraft Corporation of America
3900 West 43rd Street
Chicago, Illinois 60632

Operator Contact:

Tim Hannon
773/254-8000

1.4 General Source Description

Bagcraft Corporation of America is a flexible packaging converter, and purchases a variety of papers, aluminum foils and plastic films, along with inks, adhesives (glues), and paraffin wax, and combines them into finished paper bags for a number of customers, primarily for use in food packaging. These bags are placed in corrugated cartons according to each customer's specifications, palletized, wrapped for shipping and delivered to the appropriate customers.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

acfm	Actual cubic feet per minute
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British Thermal Unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
°F	degrees Fahrenheit
ft ³	Cubic Foot
gal	gallon
HAP	Hazardous Air Pollutant
hr	Hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
°K	degrees Kelvin
kg	kilogram
kW	Kilowatts
lb	Pound
m	Meter
Mg	Megagrams
mmBtu	Million British Thermal Units
mo	month
MW	Megawatts
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
T	ton
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
yr	Year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 202.210(a)(2) or (a)(3), as follows:

Bag Line #161

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

- a. Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].
- b. Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].
- c. Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Addition of Insignificant Activities

- 3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in this permit in Condition 3.1, until the renewal application for this permit is submitted pursuant to 35 IAC 201.212(a).
- 3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Paper Bag Manufacturing Line 1 with In-Line Flexographic Printing Unit	1969	None
03	Paper Bag Manufacturing Line 3 with In-Line Flexographic Printing Unit	1988	None
07	Paper Bag Manufacturing Line 7 with In-Line Flexographic Printing Unit	1972	None
10	Paper Bag Manufacturing Line 10 with In-Line Flexographic Printing Unit	1994	None
12	Paper Bag Manufacturing Line 12 with In-Line Flexographic Printing Unit	1994	None
15	Paper Bag Manufacturing Line 15 with In-Line Flexographic Printing Unit	1994	None
16	Paper Bag Manufacturing Line 16 with In-Line Flexographic Printing Unit	1994	None
19	Paper Bag Manufacturing Line 19 with In-Line Flexographic Printing Unit	1978	None
20	Paper Bag Manufacturing Line 20 with In-Line Flexographic Printing Unit	1966	None
22	Paper Bag Manufacturing Line 22 with In-Line Flexographic Printing Unit	1971	None
34	Paper Bag Manufacturing Line 34 with In-Line Flexographic Printing Unit	1994	None
35	Paper Bag Manufacturing Line 35 with In-Line Flexographic Printing Unit	1994	None
38	Paper Bag Manufacturing Line 38 with In-Line Flexographic Printing Unit	1994	None
65	Paper Bag Manufacturing Line 65 with In-Line Flexographic Printing Unit	1973	None
69	Paper Bag Manufacturing Line 69 with In-Line Flexographic Printing Unit	1987	None

70	Paper Bag Manufacturing Line 70 with In-Line Flexographic Printing Unit	1972	None
86	Paper Bag Manufacturing Line 86 with In-Line Flexographic Printing Unit	1985	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
88	Paper Bag Manufacturing Line 88 with In-Line Flexographic Printing Unit	1954	None
95	Paper Bag Manufacturing Line 95 with In-Line Flexographic Printing Unit	1985	None
100	Paper Bag Manufacturing Line 100 with In-Line Flexographic Printing Unit	1987	None
101	Paper Bag Manufacturing Line 101 with In-Line Flexographic Printing Unit	1978	None
103	Paper Bag Manufacturing Line 103 with In-Line Flexographic Printing Unit	1987	None
110	Paper Bag Manufacturing Line 110 with In-Line Flexographic Printing Unit	1983	None
112	Paper Bag Manufacturing Line 112 with In-Line Flexographic Printing Unit	1984	None
116	Paper Bag Manufacturing Line 116 with In-Line Flexographic Printing Unit	1986	None
118	Paper Bag Manufacturing Line 118 with In-Line Flexographic Printing Unit	1987	None
119	Paper Bag Manufacturing Line 119 with In-Line Flexographic Printing Unit	1987	None
120	Paper Bag Manufacturing Line 120 with In-Line Flexographic Printing Unit	1987	None
121	Paper Bag Manufacturing Line 121 with In-Line Flexographic Printing Unit	1988	None
124	Paper Bag Manufacturing Line 124 with In-Line Flexographic Printing Unit	1989	None
125	Paper Bag Manufacturing Line 125 with In-Line Flexographic Printing Unit	4/1992	None
126	Paper Bag Manufacturing Line 126 with In-Line Flexographic Printing Unit	4/1992	None
130	Paper Bag Manufacturing Line 130	4/1992	None

	with In-Line Flexographic Printing Unit		
131	Paper Bag Manufacturing Line 131 with In-Line Flexographic Printing Unit	4/1992	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
132	Paper Bag Manufacturing Line 132 with In-Line Flexographic Printing Unit	4/1992	None
133	Paper Bag Manufacturing Line 133 with In-Line Flexographic Printing Unit	4/1992	None
134	Paper Bag Manufacturing Line 134 with In-Line Flexographic Printing Unit	1963	None
137	Paper Bag Manufacturing Line 137 with In-Line Flexographic Printing Unit	Prior to 1991	None
138	Paper Bag Manufacturing Line 138 with In-Line Flexographic Printing Unit	Prior to 1991	None
146	Paper Bag Manufacturing Line 146 with In-Line Flexographic Printing Unit	1995	None
151	Paper Bag Manufacturing Line 151 with In-Line Flexographic Printing Unit	1999	None
161	Paper Bag Manufacturing Line 161 with In-Line Flexographic Printing Unit	1999	None
162	Paper Bag Manufacturing Line 162 with In-Line Flexographic Printing Unit	1999	None
191	Paper Bag Manufacturing Line 191 with In-Line Flexographic Printing Unit	1997	None
193	Paper Bag Manufacturing Line 193 with In-Line Flexographic Printing Unit	1999	None
200	6 - Color Flexo Press	1998	None
201	2 Howleg Printers	1998	None
202	Weber Printer	1998	None
BA	Annex Forced Air Boiler	1973	None
BP	Pacific Low Pressure Boiler	1973	None
BC	Cleaver Brooks Boiler	1973	None
PW	Photopolymer Plate Washer	1986	None
SVE	Soil Vapor Extraction System	1996	Granular Activated Carbon Control

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit - Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b.
 - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
 - ii. The operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA pursuant to 35 IAC 212.312.
 - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust

suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program.

- c. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to the 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm, [35 IAC 214.301].

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.3 Non-Applicability of Regulations of Concern

5.3.1 This permit is issued based on the source not being subject to 40 CFR 63, Subpart KK National Emission Standards for the Printing and Publishing Industry, because the source is not a major source of HAP emissions. (See also Condition 5.5.2)

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0, of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	72.6
Sulfur Dioxide (SO ₂)	----
Particulate Matter (PM)	0.46
Nitrogen Oxides (NO _x)	2.99
HAP, not included in VOM	2.82
TOTAL	76.87

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology (see Condition 5.9). The source is limited to these levels so that the printing lines will be exempt from the majority of 40 CFR 63 Subpart KK national Emission Standards for the Printing and Publishing Industry. Printing facilities that are limited to under major source status for HAPs are only subject to certain recordkeeping requirements.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1 pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 The Permittee shall maintain records of the following items to verify that the source is not a major source for

HAP emissions and therefore not subject to 40 CFR 63, Subpart KK:

- a. The mass of all HAP containing materials used in pounds.
- b. The mass fraction of HAP present (weight percent) in each HAP containing material used on a monthly basis.
- c. Records of all required measurements and calculations needed to demonstrate compliance with Condition 5.5.2.

5.6.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Annual emissions from the source in excess of the emission limits specified in Condition 5.5.1 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating HAP Emissions

HAP Emissions from Ink and Coating Usage = Ink Coating Usage in Pounds X HAP Content in Weight Percent

HAP Emissions from other Materials = Material Consumption in Pounds X HAP Content in Weight Percent

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). Sources may also transfer or sell the ATUs that they holds to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
 - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its

Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.650(a), and shall be submitted in accordance with the following:

- i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and

- ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Agency;
 - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source, as it is a participating source, is 228 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 25.23 tons.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Section 7 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments

There are no contingent allotments for this source.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
- ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Paper Bag Manufacturing Lines with Flexographic Printing Units.

7.1.1 Description

The paper bag manufacturing lines produce finished paper bags. Intermediate processes performed on the lines include 1) printing, 2) laminating, 3) waxing, 4) folding, gluing and cutting. The individual printing units listed are used with the paper bag manufacturing lines but have not been specified as only being used with an individual bag manufacturing line.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01,03, 07, 10, 12, 15, 16, 19, 20, 22, 34, 35, 38, 65, 69, 70, 86, 88, 95, 100, 101, 103, 110, 112, 116, 118, 119, 120, 121, 124, 125, 126, 130, 131, 132, 133, 134, 135, 137, 138, 146, 151, 161, 162, 191, & 193	46 Paper Bag Manufacturing Lines with In-Line Flexographic Printing Units	None
200	8-Color Flexo Press	None
201	2 Holweg Printers	None
202	Weber Printer	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected emission unit" for the purpose of these unit specific conditions, is an emission unit listed in Condition 7.1.2.
- b. Each Affected emission unit is subject to the emission limits identified in Condition 5.2.2.
- c. The Permittee shall only apply inks or coatings on the affected emission units that comply with one of the following requirements pursuant to 35 IAC 218.401 [Flexographic Printing Regulations]:
 - i. Twenty-five percent VOM by volume of the

volatile content in the ink and coating, or

- ii. Twenty-five percent VOM by volume of the volatile content in the ink and coating on a daily weighted average basis.

- d. The affected emission units are subject to 35 IAC 212.321 which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, which exceeds the allowable emission rates specified by the following equation:

$$E = A(P)^B$$

Where:

P = Process weight rate; and

E = Allowable emission rate; and,

For process weight rates up to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

- e. Notwithstanding Condition 7.1.3d lines 1, 22 and 134 may comply with 35 IAC 212.322, instead of Condition 7.1.3d which provides that:

- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified by the following equation:

$$E = C + A(P)^B$$

Where:

P = Process weight rate; and

E = Allowable emission rate; and,

For process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0.00	0.00

7.1.4 Non-Applicability of Regulations of Concern

The "affected emission units" are not subject to 35 IAC 218.301 which limits emissions of organic material to 8 pounds per hour per emission unit because 35 IAC 218.402(b) exempts these emission units.

7.1.5 Operational Limitations

Natural gas shall be the only fuel used for the affected emission units.

7.1.6 Emission Limitations

- a. Total VOM emissions and aggregate operation of emission units 10, 12, 15, 16, 34, 35, 38, 135, 146, 151, 161, 162, 191, 193, 200, 201, and 202 and their associated printing units shall not exceed the following limits:

<u>Ink and Adhesive Usage</u> <u>(Lb/Mo)</u>	<u>Total VOM Usage</u> <u>(Lb/Mo)</u>	<u>VOM Emissions</u> <u>(T/Mo)</u>	<u>(T/Yr)</u>
85,000	5,000	2.5	22.9

These limits are based on maximum operation and material balance. Compliance with annual limits shall be determined from a running total of 12 months of data.

The above limitations were established in Construction Permit 99050039, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 IAC Part 203.

- b. Total VOM emissions and aggregate operation of all the bagging machines and printing units shall not exceed the following limits:

<u>Ink and Adhesive Usage</u> <u>(Lb/Mo)</u>	<u>Total VOM Usage</u> <u>(Lb/Mo)</u>	<u>VOM Emissions</u> <u>(T/Mo)</u>	<u>(T/Yr)</u>
171,800	13,400	6.7	62.8

These limits are based on maximum operation and material balance. Compliance with annual limits shall be determined from a running total of 12 months of data.

The above limitations were established in Construction Permit 97100037, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 IAC Part 203.

- c. The VOM emissions from bagger Line 135 shall not exceed 271 lb/month and 1.63 tons/year. These limits are based on the material usage, VOM content of material and material balance. Compliance with annual limits shall be determined from a running total of 12 months of data.

The above limitations were established in Construction Permit 00110076, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned construction permit does not constitute a new major source or major modification pursuant to 35 IAC Part 203.

7.1.7 Testing Requirements

- a. Upon request by the Illinois EPA, the VOM contents of inks and coatings from affected emission units shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A, pursuant to 35 IAC 218.404.
- b. If the Permittee intends to take credit for VOM containing waste shipped off-site, then the percent concentration of solvent in the VOM containing waste from the affected emission units shall be determined according to USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

7.1.8 Monitoring Requirements

N/A

Note: There are monitoring reports required in Condition 8.6.1.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected emission units to demonstrate compliance with the permit Conditions pursuant to Section 39.5(7)(b) of the Act:

- a. The name and identification number of each ink and coating as applied [35 IAC 218.404(c)(2)(A)].

- b. The VOM content of each ink and coating in volume percent as applied [35 IAC 218.404(c)(2)(B)].
- c. The daily weighted average VOM content of all inks and coatings as applied in volume percent for each affected line using daily-weighted averaging as the method of compliance [35 IAC 218.404(d)(2)(C)].
- d. The monthly total ink, adhesive and solvent usages in pounds for the affected lines.
- e. The monthly usage of ink, coating and solvent for lines 10, 12 15, 16, 34, 35, 38, 146, 151, 161, 162, 191, 193, 200, 201 and 202 in pounds.
- f. The VOM content (weight percent) of VOM containing waste sent off-site as determined by Condition 7.1.7(b), if applicable.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected emission unit with the permit requirements within 30 days of the violation pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.1.11 Operational Flexibility

N/A

7.1.12 Compliance Procedures

- a. Compliance with emission limits shall be determined using the emission formulas listed below:

$$\text{VOM Emissions from Ink \& Coating Usage} = \frac{\text{Ink and Coating Usage (pounds or gallons)}}{\text{VOM Content (wt. \% or VOL \%)}} \times$$

$$\text{VOM Emissions from Cleanup Solvent} = \frac{\text{Cleanup Solvent Consumption (pounds or gallons)}}{\text{VOM Content (wt. \% or VOL \%)}} \times$$

$$\text{Reduction from VOM Containing Materials} = \frac{\text{VOM Containing Materials Shipped Off - Site (pounds or gallons)} \times \text{VOM Content (wt. \% or VOL \%)}}{\text{VOM Containing Materials}}$$

$$\text{Total VOM Emissions} = \text{VOM Emissions from Ink and Coating Usage} + \text{VOM Emissions from Cleanup Solvent} - \text{Reduction VOM Containing Materials}$$

b. The following equation shall be used to determine the daily weighted average VOM content of all coatings and inks.

$$\text{VOM}_{(i)(B)} = \frac{\sum_{i=1}^n C_i L_i V_{vmi}}{\sum_{i=1}^n L_i V_{vmi}}$$

Where:

$\text{VOM}_{(i)(B)}$ = The weighted average VOM content in units of percent VOM by volume of the volatile content of all coatings and inks used each day;

i = Subscript denoting a specific coating or ink as applied;

n = The number of different coatings and/or inks as applied each day on each printing line;

C_i = The VOM content in units of percent VOM by volume of the volatile matter in each coating or ink as applied;

L_i = The liquid volume of each coating or ink as applied in units of 1 (gal); and

V_{vmi} = The volume fraction of volatile matter in each coating or ink as applied.

c. Compliance provisions addressing Conditions 7.1.3(d) and (e) (35 IAC 212.321 or 212.322) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of an affected line.

7.2 Natural Gas Fired Boiler

7.2.1 Description

The boilers produce heat for the building and process steam for manufacturing activities.

7.2.2 List of Emission Equipment

Emission Unit	Description	Capacity mmBtu/hr
BA	Annex Forced Air Boiler	1.1
BP	Pacific Low Pressure Boiler	11.5
BC	Cleaver Brooks Boiler	6.3

7.2.3 Applicability Provisions and Applicable Regulations

- a. i. The "affected boiler" for the purpose of these unit specific conditions, is each boiler listed in Condition 7.2.2.
- ii. Each affected boiler is subject to the emission limits identified in Condition 5.2.2.
- b. No person shall cause or allow the emission of carbon monoxide into the atmosphere from Boiler BP to exceed 200 ppm, corrected to 50 percent excess air on a per boiler basis [35 IAC 216.121].

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected boilers are not subject to NSPS, 40 CFR 60 Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units, since each steam generating unit was constructed, modified, or reconstructed prior to June 9, 1989 which is the applicability date.
- b. Boilers BA and BC are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission sources, since the actual heat input from each boiler is less than 2.9 MW (10 mmBtu/hr).
- c. The affected boilers are not subject to 35 IAC 217.141, Existing Emission Sources in Major Metropolitan Areas, since the actual heat input of the boilers is less than 73.2 MW (250 mmBtu/hr).
- d. The affected boilers are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.303, Fuel Combustion Emission Sources, which

excludes the affected boilers from this requirement.

7.2.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel fired in the affected boilers.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the boilers are subject to the following:

N/A

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Condition 5.5.1 pursuant to Section 39.5(7)(b) of the Act:

- a. Fuel usage (ft^3/yr), and
- b. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.2.12 (ton/yr).

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected line with the permit requirements within 30 days of the violation pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and corrective actions or preventive measures taken.

7.2.11 Operational Flexibility

N/A

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3(b) is assumed to be achieved by the work practices inherent in operation of a natural gas-fired boiler, thus no compliance procedures are set in this permit addressing this regulation.

- b. To determine compliance with Condition 5.5.1 emissions from the affected boilers shall be based on the emission factors listed below:

<u>Pollutant</u>	<u>Natural Gas Emission Factors for Boilers (lb/10⁶ ft³)</u>
NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in boilers, Tables 1.4-1 and 1.4-2.

Boiler Emissions (lb) = (Natural Gas Consumed, ft³)
x (The Appropriate Emission Factor)

7.3 Photopolymer Plate Washer

7.3.1 Description

Photopolymer plate washer washes away the unexposed portion of the printing plate with a solvent blend.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
PW	Photopolymer Plate Washer	None

7.3.3 Applicability Provisions and Applicable Regulations

- a.
 - i. The "affected plate washer" for the purpose of these unit specific conditions, is a plate washer listed in Condition 7.3.2.
 - ii. The affected plate washer is subject to the emission limits identified in Condition 5.2.2.
- b. The owner or operator shall not cause or allow the discharge of more than 3.6 Kg/hr (8 lbs/hr) of organic material into the atmosphere from an affected plate washer [35 IAC 218.301]. If no odor nuisance exists this limitation shall apply only to photochemically reactive material.

7.3.4 Non-Applicability of Regulations

The control requirements of 35 IAC 218 Subpart TT do not apply because the potential VOM emissions from unregulated emission units are below the applicability level of 25 tons of potential VOM emissions per year.

7.3.5 Operational Work Practices

N/A

7.3.6 Emission Limitations

Emissions and operation of the photopolymer plate operation shall not exceed the following limits:

<u>Material</u>	<u>Usage Rate</u> (gal/mo)(gal/yr)	<u>Specific Gravity</u> (lb/gal)	<u>Pollutant</u>	<u>Emission Rate</u> (lb/mo)(T/yr)
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Photopolymer

Wash Solution 742 8,904 11.68 VOM 1,300 7.8

These limits define the potential emissions of VOM and are based on the maximum material usage, a 15% loss rate of material used, and the maximum VOM content of the materials. This limitation originates from permit 95120277.

7.3.7 Testing Requirements

Upon request by the Illinois EPA, the percent concentration of solvent in the VOM containing waste from the affected plate washer shall be determined according to USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected plate washer to demonstrate compliance with the permit conditions pursuant to Section 39.5(7)(b) of the Act:

- a. Monthly gallons of photopolymer wash solution.
- b. Monthly gallons of waste solvent shipped offsite.
- c. VOM content of waste solvent shipped offsite.
- d. Records that indicate solvents used are not photochemically reactive and there is no odor nuisance, or records that indicate maximum organic material emissions never exceed 8 pounds per hour.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected plate washer with the permit requirements within 30 days of the violation pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.3.11 Operational Flexibility

N/A

7.3.12 Compliance Procedures

Compliance with emission limits shall be determined using the emission formula listed below:

$$\text{VOM Emissions from Solvent Usage (lb)} = \text{Solvent Usage (gal)} \times \frac{\text{Solvent VOM Content}}{100} \times 15\% \text{ (lb / gal)}$$

7.4 Soil Vapor Extraction System with Granular Activated Carbon Control

7.4.1 Description

The soil vapor extraction system removes VOM from the soils at the Bagcraft facility.

7.4.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
SVE	Soil Vapor Extraction System	Granular Activated Carbon Control

7.4.3 Applicable Provisions and Regulations

- a. An "affected extraction system" for the purpose of these unit specific conditions, is an extraction system listed in Condition 7.4.2.
- b. The affected extraction system is subject to the emission standards identified in Condition 5.2.2. Compliance with the regulations of general applicability will be achieved as a result of the routine operation of this unit. Therefore, no provisions to address these requirements have been established.
- c. No person shall cause or allow the discharge of more than 3.6 Kg/hr (8 lbs/hr) of organic material into the atmosphere from the affected extraction system. If no odor nuisance exists, this limitation shall apply only to photochemically reactive material [35 IAC 218.301].

7.4.4 Non-Applicability of Regulations

The control requirements of 35 IAC 218 Subpart TT do not apply because the potential VOM emissions from unregulated emission units are below the applicability level of 25 tons of potential VOM emissions per year.

7.4.5 Operational and Production Limits and Work Practices

N/A

7.4.6 Emission Limitations

Volatile organic material emissions from the soil vapor extraction system shall not exceed 8 lb/hr and 2.0 tons/yr. This limit is based on VOM concentration of soil, flow rate, and total VOC in soil contaminated. Compliance with annual limit shall be determined from a running total of 12 months of data.

The above limitations were established in Construction Permit 97100037. These limits ensure that the affected extraction system is not subject to the control requirements of 35 IAC Part 281, Subpart TT.

7.4.7 Testing Requirements

N/A

7.4.8 Monitoring Requirements

N/A

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected extraction system to demonstrate compliance with the permit conditions pursuant to Section 39.5(7)(b) of the Act:

- a. Organic material concentration of the contaminated soil gas.
- b. Flow rate of the affected extraction system (cfm).
- c. Hours of operation.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected extraction system with the permit requirements within 30 days of the violation pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.4.11 Operational Flexibility

N/A

7.4.12 Compliance Procedures

Compliance with emission limits shall be determined using the emission formula listed below:

$$ER = (Q \times C \times MW \times 1.581 \times 10^{-7})$$

Where:

ER = Emission rate (lb/hr)

Q = Pumping rate (cfm)

C = Soil gas concentration (ppm-v)

MW = Molecular weight of contaminant (lb/lb-mole)

The constant (1.581×10^{-7}) has units of [(lb-mole/m³)/((ft³ ppm-v hr))].

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements as of the date the proposed permit for this source was issued. This shield is granted based on the Illinois EPA's review of the permit application for this source and its determination that all applicable requirements are specifically identified in this permit. If the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to the source, the Illinois EPA's written determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after July 21, 1998 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Program

No permit revision shall be required for increases in emissions allowed under any approved economic incentive, marketable permits, emissions trading, or other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. (Section 39.5(7)(o)(vii) of the Act)

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this

permit following implementation of the physical or operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other process, emissions, or composition parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;

- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency (MC 40)
Bureau of Air
Compliance Section
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Divisions of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

United States EPA (AR - 18J)
Air & Radiation Branch (Illinois - Indiana)
77 W. Jackson Boulevard
Chicago, Illinois 60604

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule. [Section 39.5(7)(j)(iv) of the Act]

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the Clean Air Act, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Air Act and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

The Permittee shall meet applicable requirements that

become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition. [Section 39.5(6)(c) of the Act]

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act] The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege. [Section 39.5(7)(0)(iv) of the Act]

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes. [Section 39.5(12)(b) of the Act]

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7)(e)(ii) of the Act]
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall

submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certifications shall include descriptions on means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can

identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality. [Section 39.5(7)(o)(v) of the Act]

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if

this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions. [Section 39.5(5)(1), (n) and (o) of the Act]

10.0 ATTACHMENTS

10.1 Attachment 1 - Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

DWH:psj

10.2 ATTACHMENT 2 - BASELINE EMISSIONS SUMMARY

Seasonal VOM emissions from excluded units, in tons/season (TPS):

<u>Emission Unit</u>	<u>Proposed</u>	<u>Illinois EPA Determination</u>	<u>Notes</u>
Annex Boiler			
Pacific Boiler			
Cleaver Brooks Boiler	0.01484	<u>0.01</u>	1
		Subtotal 0.01	

Seasonal VOM emissions from units subject to further reduction, in TPS:

<u>Emission Unit</u>	<u>Proposed</u>	<u>Illinois EPA Determination</u>	<u>Notes</u>
Paper Bag			
Manufacturing Lines	23.356	23.36	
Photopolymer			
Plate Washer	1.857	1.86	1
Flexo Press #182	0.31	0.31	
Bagger Lines #163, 164, and 191	0.30	0.30	
		Subtotal 25.83	

1 ATU equals 200 lbs of VOM [35 IAC 205.130], or using standard conversion rate of 2000 lbs per ton, 10 ATU=s equals 1 ton.

The source shall maintain records of actual seasonal VOM emissions for each emission unit subject to further reduction in accordance with the recordkeeping and compliance procedures identified in the CAAPP permit starting with the 1998 seasonal allotment period of May 1 through September 30. The source shall submit the seasonal emissions information, as a component of the Annual Emissions Report by November 30 of each year pursuant to 35 IAC 205.300.

TOTAL SOURCE ALLOTMENT = 0.01 + 0.88 x 25.83 = 22.7404

OR 228 ATU

Notes:

- 1 The Illinois EPA has adjusted your emissions due to rounding the numbers.

DWH:psj

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. Unlike this source's current state operating permit(s), the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Bagcraft Corporation of America is a flexible packaging converter, and purchases a variety of papers, aluminum foils and plastic films, along with inks, adhesives (glues), and paraffin wax, and combines them into finished paper bags for a number of customers, primarily for use in food packaging. These bags are placed in corrugated cartons according to each customer's specifications, palletized, wrapped for shipping and delivered to the appropriate customers.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Paper Bag Manufacturing Line 1 within In-Line Flexographic Printing Unit	1969	None
03	Paper Bag Manufacturing Line 3 within In-Line Flexographic Printing Unit	1988	None
07	Paper Bag Manufacturing Line 7 within In-Line Flexographic Printing Unit	1972	None
10	Paper Bag Manufacturing Line 10 within In-Line Flexographic Printing Unit	1994	None
12	Paper Bag Manufacturing Line 12 within In-Line Flexographic Printing Unit	1994	None
15	Paper Bag Manufacturing Line 15 within In-Line Flexographic Printing Unit	1994	None
16	Paper Bag Manufacturing Line 16 within In-Line Flexographic Printing Unit	1994	None
19	Paper Bag Manufacturing Line 19 within In-Line Flexographic Printing Unit	1978	None
20	Paper Bag Manufacturing Line 20 within In-Line Flexographic Printing Unit	1966	None

22	Paper Bag Manufacturing Line 22 within In-Line Flexographic Printing Unit	1971	None
34	Paper Bag Manufacturing Line 34 within In-Line Flexographic Printing Unit	1994	None

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Emission Unit	Description	Date Constructed	Emission Control Equipment
35	Paper Bag Manufacturing Line 35 within In-Line Flexographic Printing Unit	1994	None
38	Paper Bag Manufacturing Line 38 within In-Line Flexographic Printing Unit	1994	None
65	Paper Bag Manufacturing Line 65 within In-Line Flexographic Printing Unit	1973	None
69	Paper Bag Manufacturing Line 69 within In-Line Flexographic Printing Unit	1987	None
70	Paper Bag Manufacturing Line 70 within In-Line Flexographic Printing Unit	1972	None
86	Paper Bag Manufacturing Line 86 within In-Line Flexographic Printing Unit	1985	None
88	Paper Bag Manufacturing Line 88 within In-Line Flexographic Printing Unit	1954	None
95	Paper Bag Manufacturing Line 95 within In-Line Flexographic Printing Unit	1985	None
100	Paper Bag Manufacturing Line 100 within In-Line Flexographic Printing Unit	1987	None
101	Paper Bag Manufacturing Line 101 within In-Line Flexographic Printing Unit	1978	None
103	Paper Bag Manufacturing Line 103 within In-Line Flexographic Printing Unit	1987	None
110	Paper Bag Manufacturing Line 110 within In-Line Flexographic Printing Unit	1983	None
112	Paper Bag Manufacturing Line 112 within In-Line Flexographic	1984	None

	Printing Unit		
116	Paper Bag Manufacturing Line 116 within In-Line Flexographic Printing Unit	1986	None
118	Paper Bag Manufacturing Line 118 within In-Line Flexographic Printing Unit	1987	None
119	Paper Bag Manufacturing Line 119 within In-Line Flexographic Printing Unit	1987	None
120	Paper Bag Manufacturing Line 120 within In-Line Flexographic Printing Unit	1987	None

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Emission Unit	Description	Date Constructed	Emission Control Equipment
121	Paper Bag Manufacturing Line 121 within In-Line Flexographic Printing Unit	1988	None
124	Paper Bag Manufacturing Line 124 within In-Line Flexographic Printing Unit	1989	None
125	Paper Bag Manufacturing Line 125 within In-Line Flexographic Printing Unit	4/1992	None
126	Paper Bag Manufacturing Line 126 within In-Line Flexographic Printing Unit	4/1992	None
130	Paper Bag Manufacturing Line 130 within In-Line Flexographic Printing Unit	4/1992	None
131	Paper Bag Manufacturing Line 131 within In-Line Flexographic Printing Unit	4/1992	None
132	Paper Bag Manufacturing Line 132 within In-Line Flexographic Printing Unit	4/1992	None
133	Paper Bag Manufacturing Line 133 within In-Line Flexographic Printing Unit	4/1992	None
134	Paper Bag Manufacturing Line 134 within In-Line Flexographic Printing Unit	1963	None
137	Paper Bag Manufacturing Line 137 within In-Line Flexographic Printing Unit	Prior to 1991	None
138	Paper Bag Manufacturing Line 138	Prior to	None

	within In-Line Flexographic Printing Unit	1991	
146	Paper Bag Manufacturing Line 146 within In-Line Flexographic Printing Unit	1995	None
191	Paper Bag Manufacturing Line 191 within In-Line Flexographic Printing Unit	1997	None
200	8 - Color Flexo Press	1998	None
201	2 Howleg Printers	1998	None
202	Weber Printer	1998	None
BA	Annex Forced Air Boiler	1973	None
BP	Pacific Low Pressure Boiler	1973	None
BC	Cleaver Brooks Boiler	1973	None
PW	Photopolymer Plate Washer	1986	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions. The proposed permit limits the maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source limit.

For purposes of fees, the source is allowed the following emissions:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	72.6
Sulfur Dioxide (SO ₂)	----
Particulate Matter (PM)	0.46
Nitrogen Oxides (NO _x)	2.99
HAP, not included in VOM	2.82
TOTAL	76.87

IV. APPLICABLE EMISSION STANDARDS

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

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

A CAAPP permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, recordkeeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

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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 Ill. Adm. Code Part 164.

DWH:95050147:psj

MEMORANDUM

DATE: November 2, 1998
TO: John Kelly
FROM: David Hulskotter
SUBJECT: CAAPP Permit for Bagcraft Corporation of America

The CAAPP permit will be revised to include the new AP-42 natural gas combustion emission factors.

DWH:95050147:jar

217/782-2113

November 30, 1998

Bagcraft Corporation of America
Attn: Tim Hannon
3900 West 43rd Street
Chicago, Illinois 60632

Re: Clean Air Act Permit Program (CAAPP) Permit
I.D. No.: 031600ACL
Application No.: 95050147

Dear Mr. Hannon:

Enclosed is your CAAPP permit.

Please note that the provisions in Section 6 of this permit relating to the Emission Reduction Market System (ERMS) are different from those in the draft permit in a key respect. Specifically, the permit provides that the source must begin to operate under the ERMS following the initial issuance of trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended). This change is due to delays in the initial issuance of CAAPP Permits which could interfere with effective trading for the 1999 season. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emission reductions achieved in 1999 in preparation for the ERMS.

If you have any questions regarding this permit, please contact David Hulskotter at 217/782-2113.

Sincerely,

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

DES:DWH:jar

Enclosure

