



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

JUN 29 2006

(AE-17 )

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Thomas Pecora, President  
Champion Packaging & Distribution, Inc  
1840 Internationale Pkwy  
Woodridge, IL 60517

Re: Notice of Violation

Dear Mr. Pecora:

The United States Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to Champion Packaging & Distribution, Inc. (you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you are violating the Illinois State Implementation Plan at your Woodridge, Illinois, facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action. The options we select may depend on, among other things, the length of time you take to achieve and demonstrate continuous compliance with the rules cited in the NOV.

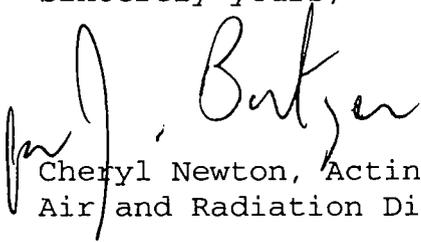
We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent

you at this conference.

The EPA contact in this matter is Brian Dickens. You may call him at (312) 886-6073 to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Cheryl Newton". The signature is written in dark ink and is positioned above the typed name.

Cheryl Newton, Acting Director  
Air and Radiation Division

Enclosure

cc: Julie Armitage, IEPA

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

<b>IN THE MATTER OF:</b>	)	
	)	
Champion Packaging & Distribution, Inc.	)	<b>NOTICE OF VIOLATION</b>
	)	<b>EPA-5-06-22-IL</b>
	)	
Proceedings Pursuant to Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1)	)	
	)	
	)	
	)	

**NOTICE OF VIOLATION**

The United States Environmental Protection Agency (U.S. EPA) is issuing this Notice of Violation under Section 113(a)(1) of the Clean Air Act (Act), 42 U.S.C. § 7413(a)(1). U.S. EPA finds that Champion Packaging & Distribution, Inc. (Champion) is violating the Illinois State Implementation Plan (SIP) as follows:

**Statutory and Regulatory Background**

1. Section 110 of the Act, 42 U.S.C. § 7410, requires each state to adopt and submit to U.S. EPA for approval a State Implementation Plan (SIP) that provides for the implementation, maintenance, and enforcement of the National Ambient Air Quality Standards (NAAQS). Pursuant to Section 113(a) and (b) of the Act, 42 U.S.C. § 7413(a) and (b), upon U.S. EPA approval, SIP requirements are federally enforceable under Section 113. See also 40 C.F.R. 52.23.
2. On May 31, 1972, U.S. EPA approved Illinois Pollution Control Board (IPCB) Rule 103 as part of the federally enforceable SIP for the State of Illinois. 37 Fed. Reg. 10862.
3. IPCB Rule 103(a)(1) provides that no person shall cause or allow the construction of any new emission source or any new air pollution control equipment, or cause or allow the modification of any existing emission source or air pollution

control equipment, without first obtaining a construction permit from the Illinois Environmental Protection Agency (IEPA). IPCB Rule 103(a)(1) has been recodified at 35 Illinois Administrative Code (IAC) § 201.142.

4. IPCB Rule 103 (b)(1) provides that no person shall cause or allow the operation of any new emission source or new air pollution control equipment of a type for which a construction permit is required by IPCB Rule 103(a) without first obtaining an operating permit from IEPA. IPCB Rule 103(b)(1) has been recodified at 35 IAC § 201.143.
5. An "emission source" is defined in 35 IAC § 201.102 as any equipment or facility of a type capable of emitting specified air contaminants to the atmosphere.
6. An "air contaminant" is defined in 35 IAC § 201.102 as any solid, liquid or gaseous matter, any odor or any form of energy, that is capable of being released into the atmosphere.
7. A "new emission source" is defined in 35 IAC § 201.102 to mean any emission source for which construction or modification began after April 14, 1972.

### **Facts and Discussion**

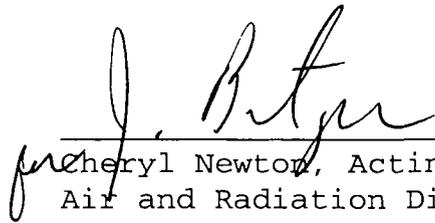
8. Champion owns and operates a chemical mixing and packaging operation at its Woodridge, Illinois, facility. The facility makes a variety of products, including automotive windshield washer fluid and bleach. Windshield washer fluid contains methanol.
9. Champion began operation of the windshield washer fluid fill line in or around 1999.
10. Champion emits methanol, which is an air contaminant, a volatile organic compound (VOC), and a hazardous air pollutant (HAP), at its underground storage tank, its day storage tank, and its filling operations.

Violations

11. Champion is in violation of 35 IAC § 201.142 for failing to obtain a construction permit from IEPA prior to constructing a new emission source.

12. Champion is in violation of 35 IAC § 201.143 for operating an emission source without first obtaining an operating permit from IEPA.

6/29/06  
Date

  
Cheryl Newton, Acting Director  
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Notice of Violation, No. EPA-5-06-22-IL, by Certified Mail, Return Receipt Requested, to:

Thomas Pecora, President  
Champion Packaging & Distribution, Inc  
1840 Internationale Pkwy  
Woodridge, IL 60517

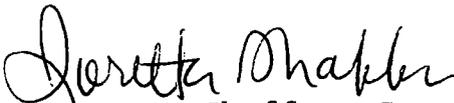
I also certify that I sent copies of the Notice of Violation by first class mail to:

Roman Dabros, Engineer  
Illinois Environmental Protection Agency  
9511 West Harrison Street  
Des Plaines, Illinois 60016

and

Julie Armitage, Section Manager  
Compliance and Systems Management Section  
Illinois Environmental Protection Agency  
P.O. Box 19506  
Springfield, Illinois 62794-9506

on the 30 day of June, 2006.

  
Loretta Shaffer, Secretary  
AECAS, (MN/OH)

CERTIFIED MAIL RECEIPT NUMBER: 70010320000589193208