



217-785-1705

CONSTRUCTION PERMIT – NSPS SOURCE

PERMITEE

International Paper Co
Attn: Lauren P. Lee, Plant General Manager
401 Northwest Avenue
Northlake, Illinois 60164

Application No.: 25030004

I.D. No.: 031471AAT

Applicant's Designation:

Date Received: March 6, 2025

Subject: Emission limit update.

Date Issued: March 10, 2026

Location: 401 Northwest Avenue, Northlake, Cook County

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

Modification to update/revise emission factors and emission limits associated with the following existing emission units:

- One (1) 20.4 MMBtu/hr Natural Gas-fired Boiler;
- One (1) Waste Paper Handling Operations with Baler and Cyclone Separator;
- One (1) Corrugator;
- Converting and Printing equipment consisting of:
 - Four (4) Flexographic Folder Gluers (FFGs);
 - One (1) Rotary Die Cutter;
- One (1) Starch Storage Silo with baghouse;

as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This permit is issued based on the modification to emission factors and emission limits associated with existing units listed above not constituting a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the emissions of Nitrogen Oxides (NOx) and Volatile Organic Material (VOM) from the above-listed equipment below the levels that would trigger the applicability of these rules.
- b. This permit is issued based on the potential to emit (PTE) for hazardous air pollutants from the emission units being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs, or such lesser quantity as United States Environmental Protection Agency (USEPA) may

establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program (CAAPP) permit from the Illinois EPA. As a result, this permit is issued based on the emissions of all HAPs from the source not triggering the requirements of Section 112(g) of the Clean Air Act.

- c. Operation of the emission units listed above is allowed under this construction permit for twelve (12) months after the date of initial startup. Operation may continue under this construction permit until an operating permit is issued, provided that the Permittee submits an operating permit application within twelve (12) months of initial startup.
2. The Natural Gas-fired Boiler is subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subparts A and Dc. The Illinois EPA is administering the NSPS in Illinois on behalf of the USEPA under a delegation agreement. Pursuant to 40 CFR 60.40c(a), except as provided in 40 CFR 60.40c(d), (e), (f), and (g), the affected facility to which 40 CFR 60 Subpart Dc applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).
- 3a. The Natural Gas-fired Boiler, Waste Paper Handling operations and Starch Storage Silo are subject to 35 Ill. Adm. Code Part 212 Subpart B (Visible Emissions). Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. This source is subject to 35 Ill. Adm. Code Part 212 Subpart K (Fugitive Particulate Matter). Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith 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 Ill. Adm. Code 212.301 and 212.314, except as provided as in 35 Ill. Adm. Code 212.314.
- d. Pursuant to 35 Ill. Adm. Code 212.302(a), 35 Ill. Adm. code 212.304 through 212.310 and 212.312 shall apply to all mining operations (SIC major groups 10 through 14), manufacturing operations (SIC major groups 20 through 39 except for those operations subject to 35 Ill. Adm. Code Part 212 Subpart S (Grain-Handling and Grain-Drying Operations) that are outside the areas defined in 35 Ill. Adm. Code 212.324(a)(1)), and electric generating operations (SIC group 491), which are located in the areas defined by the boundaries of the following townships, notwithstanding any political subdivisions contained therein, as the township boundaries were defined on October 1, 1979, in the following counties:

Cook: All townships

- e. The Fugitive Dust Operating Program, as submitted by the permittee pursuant to 35 Ill. Adm. Code 212.309(a) and received on March 21, 2025 is incorporated herein by reference. The emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312 and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- f. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code Part 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- g. Pursuant to 35 Ill. Adm. Code 212.312, the operating program required pursuant to Condition 3(d) 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 35 Ill. Adm. Code Part 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- h. The Waste Paper Handling operations and Starch Storage Silo are subject to 35 Ill. Adm. Code Part 212 Subpart L (Particulate Matter Emissions from Process Emission Units). Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, 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, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- i. Pursuant to 35 Ill. Adm. Code 212.321(b), interpolated and extrapolated values of the data in 35 Ill. Adm. Code 212.321(c) shall be determined by using the equation:

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

where:

- P = Process weight rate; and
- E = Allowable emission rate; and,

i. Up to process weight rates of 408 Mg/hr (450 T/hr):

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

ii. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

j. Pursuant to 35 Ill. Adm. Code 212.321(c), Limits for Process Emission Units For Which Construction of Modification Commenced On or After April 14, 1972:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.	3.9	10.00	8.70
13.	4.8	15.00	10.80
18.	5.7	20.00	12.50
23.	6.5	25.00	14.00
27.	7.1	30.00	15.60
32.	7.7	35.00	17.00
36.	8.2	40.00	18.20

41.	8.8	45.00	19.20
45.	9.3	50.00	20.50
90.	13.4	100.00	29.50
140.	17.0	150.00	37.00
180.	19.4	200.00	43.00
230.	22.	250.00	48.50
270.	24.	300.00	53.00
320.	26.	350.00	58.00
360.	28.	400.00	62.00
408.	30.1	450.00	66.00
454.	30.4	500.00	67.00

where:

P = Process weight rate in metric or T/hr, and
 E = Allowable emission rate in kg/hr or lbs/hr.

4. The Natural Gas-fired Boiler is subject to 35 Ill. Adm. Code Part 216 Subpart B (Fuel Combustion Emission Sources). Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.
5. The Corrugator and Converting and Printing Equipment operations are subject to 35 Ill. Adm. Code Part 218 Subpart G (Use of Organic Material). Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code Part 218 Subpart G (Use of Organic Material) shall apply only to photochemically reactive material.
- 6a. This permit is issued based upon the Converting and Printing Equipment operations at this source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
- b. This permit is issued based upon the Converting and Printing Equipment operations at this source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ. Pursuant to 40 CFR 63.3290, the printing lines are not subject to Subpart JJJJ because the facility is not a major source of HAP.
- c. This permit is issued based on Natural Gas-fired Boiler at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63 Subpart DDDDD because this source is not or is not part of, a major source of Hazardous Air Pollutant (HAP) emissions as defined in 40 CFR 63.2.
- d. This permit is issued based on the Natural Gas-fired Boiler at this source not being subject to the NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63 Subpart JJJJJJ.

Pursuant to 40 CFR 63.11195(e), a gas-fired boiler as defined in 40 CFR 63 Subpart JJJJJ are not subject to 40 CFR 63 Subpart JJJJJ and to any requirements in 40 CFR 63 Subpart JJJJJ.

7. This permit is issued based on the Natural Gas-fired Boiler at this source not being subject to the requirements of 35 Ill. Adm. Code Part 212 Subpart E (Particulate Matter Emissions from Fuel Combustion Emission Units) as the boiler only combusts natural gas and will be constructed after April 14, 1972.
8. This permit is issued based on the Natural Gas-fired Boiler at this source not being subject to the requirements of 35 Ill. Adm. Code Part 214 Subpart B (New Fuel Combustion Emission Sources) as the boiler is rated less than 250 MMBtu/hour and will only combust natural gas.
- 9a. This permit is issued based on the solvent cleaning operations at this source not being subject to the requirements of 35 Ill. Adm. Code Part 218.187(b) (Other Industrial Solvent Cleaning Operations Material and Control Requirements). Pursuant to 35 Ill. Adm Code Part 218.187(b)(1)(C), the press cleaning solution used for cleaning flexographic printer will not exceed the VOC content limit listed in the 35 Ill. Adm. Code 218.187(b)(1)(C).
- b. This permit is issued based on the Converting and Printing Equipment operations at this source not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart F (Coating Operations). Pursuant to 218.204(c)(3), the paper coating limitation set forth in 35 Ill. Adm. Code 218.304(c) shall not apply to any owner or operator of any paper coating line on which flexographic, rotogravure, lithographic, or letterpress printing is performed if the paper coating line complies with the applicable emissions limitations in 35 Ill. Adm. Code Part 218 Subpart H (Printing and Publishing).
- c. This permit is issued based upon the Converting and Printing Equipment operations at this source not being subject to the VOM control requirements of 35 Ill. Adm. Code 218.401 (Printing and Publishing). This is a result of the federally enforceable production and operating limitations of this permit, which restrict the maximum theoretical emission of VOM to less than 100 tons per year and the potential to emit for VOM emissions to 25 tons per year. Pursuant to 218.402(a) the source is not subject to emission limitations or capture system and control device requirements in 35 Ill Adm. Code 218.401(a)-(c) because aggregate emissions from all flexographic and printing lines fall below the major source threshold for VOM (i.e., 50 tons per year for Cook County), and the flexographic printing lines have the potential to emit less than 25 tons per year of VOM at the source. In addition, flexographic printing exempt from 35 Ill. Adm. Code Part 218 Subpart H VOM emissions limits are subject to Subpart 35 Ill. Adm. Code Part 218 Subpart G (35 Ill. Adm. Code 218.301).
- d. This permit is issued based on the Corrugator, Converting and Printing Equipment operations not being subject to the requirements of 35 Ill. Adm. Code 218 Subpart JJ (Miscellaneous Industrial Adhesives). Pursuant to 35 Ill. Adm. Code 218.900(b)(1)(E), notwithstanding 35 Ill. Adm. Code 218.900(a) the requirements of 35 Ill. Adm. Code Part 218 Subpart JJ shall not apply to miscellaneous industrial adhesive application operations associated with paper, film, and foil coatings.
- e. This permit is issued based on the Corrugator not being subject to the control requirements of 35 Ill. Adm. Code 218 Subpart PP (Miscellaneous Fabricated Product Manufacturing Processes). This is a result of the federally enforceable production and operating limitation of this permit, which restrict the potential to emit for VOM emissions to less than 25 tons per year.
- f. This permit is issued based on the Converting and Printing Equipment operations not being subject to the requirements of 35 Ill. Adm. Code 218 Subpart TT (Other Emission Units). Pursuant to 35 Ill.

Adm. Code 218.980(b), the aggregate emissions from the flexographic printing lines for VOM is less than 25 tons per year, and is also regulated by 35 Ill. Adm Code 218 Subpart H.

10. Pursuant to 35 Ill. Adm. Code 218.402(e), any owner or operator of any flexographic or rotogravure printing line that is exempt from any of the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402 is subject to the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.404(b) and (f), as applicable.
- 11a. In the event that the operation of this source results in an odor nuisance the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the baghouse associated with the Starch Storage Silo such that the baghouse is kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
12. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
13. The Natural Gas-fired Boiler shall only be operated with natural gas as fuel. The use of any other fuel in the boiler may require that the Permittee first obtain a construction permit from the Illinois EPA and perform stack testing to verify compliance with all applicable requirements.
- 14a. Emissions from and operation of the natural gas-fired boiler shall not exceed the following limits:
 - i. Natural Gas Usage: 17.52 MMscf/ month and 175.20 MMscf/year.
 - ii. Emission from the combustion of natural gas:

<u>Item of Equipment</u>	<u>(MMBtu/Hr)</u>	<u>Pollutant</u>	<u>Emission Factor (lb/MMscf)</u>	<u>Emissions</u>	
				<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Boiler	20.40	CO	38.25	0.34	3.35
		NO _x	35.70	0.31	3.13
		PM	7.65	0.07	0.67
		SO ₂	0.61	0.01	0.05
		VOM	3.67	0.03	0.32

These limits are based on the maximum fuel usage and standard emissions factors are manufacturer-provided.

- b. Emissions from and operations of Waste Paper Handling operations with Baler, and Cyclone Separator shall not exceed the following limits:

Process	Throughput		Pollutant	Emission Factor (lbs/Ton baled)	Emissions	
	(Msf/Mo)	(Msf/Yr)			(Tons/Mo)	(Tons/Yr)
Waste Paper Handling operations	381,060	3,810,600	PM	2.10	2.66	26.61
			PM10	0.36	0.46	4.56
			PM2.5	0.06	0.08	0.76

These limits are based on the maximum operating rate of the corrugator, operating 8,760 hrs/yr, and emission factors developed through an emissions study conducted at another similar source, which is owned by the Permittee.

Process	Throughput		Pollutant	Emission Factor (lbs/Msf)	Emissions	
	(Msf/Mo)	(Msf/Yr)			(Tons/ Mo)	(Tons/Yr)
Corrugator	381,060	3,810,600	VOM	0.00346	0.66	6.59
			Combined HAPS	0.00381	0.73	7.26
			Single HAP(Methanol)	0.00330	0.63	6.29

The hourly corrugator throughput is 435 (Msf/hr).

The maximum baling rate of the Waste Paper Handling system is 13.3 lb/Msf per the source knowledge of facility operations.

- c. Emissions from and operation of the Corrugator shall not exceed the following limits:
- d. Emissions from the operation of the Four (4) Flexographic Folder Gluers (FFGs) and One (1) Rotary Die Cutter shall not exceed the following limits (combined):
- i. Volatile Organic Material (VOM) emissions:

Materials	Coverage (lbs/MMin ²)	Throughput (Msf/Yr)	Weight Percent (% by Wt.)	Emissions	
				(Tons/Mo)	(Tons/Yr)
Printing Ink	2.5	3,810,060	2.41	1.65	16.55
Glue	1.0	3,810,060	0.05	0.01	0.14
pH Adjuster	0.05	3,810,060	5.00	0.06	0.62
Defoamer	0.001	3,810,060	2.25	0.001	0.01
				Total:	17.31

These emissions limits are based on the VOM contents from the facility's annual VOM usage with an applied safety factor.

- e. This permit is issued based on negligible emissions of particulate matter from Starch Storage Silo. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
 - f. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12-month total).
- 15a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. **Testing by Owner or Operator.** The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. **Testing by the Illinois EPA.** The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 16 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
16. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 17a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least

two years following the date of such measurements, maintenance, reports, and records, except as follows:

The Illinois EPA or USEPA, upon notification to the source, may require the owner or operator to maintain all measurements as required by 40 CFR 60.7(f), if the Illinois EPA or USEPA determines these records are required to more accurately assess the compliance status of the affected source.

- 18a. Pursuant to 40 CFR 60.48c(a), the owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by 40 CFR 60.7. This notification shall include:
- i. The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
 - ii. If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42 or 40 CFR 60.43c.
 - iii. The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
 - iv. Notification if an emerging technology will be used for controlling SO₂ emission limits of 40 CFR 60.42c, or the PM or opacity limits of 40 CFR 60.43c, shall submit to the Illinois EPA the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS and/ or COMS using the applicable performance specifications in appendix B of section 40 CFR 60.48c.
- b. Pursuant to 40 CFR 60.48c(g)(1), except as provided under 40 CFR 60.48c(g)(2) and (g)(3), the owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each operating day.
- c. Pursuant to 40 CFR 60.48c(g)(2), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.
- d. Pursuant to 40 CFR 60.48c(g)(3), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to 40 CFR 60 Subpart Dc) at that property are natural gas, wood, distillate oil meeting the most current requirements in 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.
- e. Pursuant to 40 CFR 60.48c(i), all records required under 40 CFR 60.48c shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

19. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
20. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 21a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Natural gas usage for boiler (MMscf/month and MMscf/year);
 - ii. Monthly and Annual emissions of CO, NO_x, PM, SO₂, VOM from boiler with supporting calculations (tons/month and tons/year).
 - iii. Records addressing use of good operating practices for the baghouse associated with the Starch Storage Silo:
 - A. Records for periodic inspection of the baghouse associated with the Starch Storage Silo with date, individual performing the inspection, and nature of inspection: and
 - B. Records for prompt repair of defects , with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - iv. Names and amounts of all coatings, inks, varnishes, clean-up solvents, adhesives, additive, and any other solvents used on the flexographic presses, finishing machines, and the corrugator (tons/month and tons/year);
 - v. VOM and HAP content of all coatings, inks, varnishes, clean solvents, adhesives, additive, and any other solvents used on the flexographic presses, finishing machines, and the corrugator (weight %);

- vi. Monthly and annual emissions of PM, VOM and HAPs (individual and combined) from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by Condition 21(a) of this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA or USEPA request for records during the course of a source inspection.
- 22a. Pursuant to 40 CFR 60.7(a), any owner or operator subject to the provisions of 40 CFR Part 60 shall furnish the Illinois EPA or USEPA written notification or, if acceptable to both the Illinois EPA and USEPA and the owner or operator of a source, electronic notification, as follows:
- i. A notification of the date construction (or reconstruction as defined under 40 CFR 60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
 - ii. A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
 - iii. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Illinois EPA or USEPA may request additional relevant information subsequent to this notice.
23. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 24a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(C), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall comply with the following: Notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2), ever equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment, within 30 days after the event occurs.
- b. Pursuant to 35 Ill. Adm. Code 218.404(b)(3), on and after a date consistent with 35 Ill. Adm. Code 218.106, or, for flexographic or rotogravure printing lines that print flexible packaging or that print flexible packaging and non-flexible packaging on the same line, on and after January 1, 2012, the owner or operator of a facility exempted from the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402(a) shall notify the Illinois EPA of any record showing that total

maximum theoretical emissions of VOM from all printing lines exceed 90.7 Mg (100 tons) in any calendar year before the application of capture systems and control devices, or that the combined potential to emit of all flexographic and rotogravure printing lines at the source equals or exceeds 22.7 Mg (25 tons) of VOM in any calendar year, by sending a copy of such record to the Agency within 30 days after the exceedance occurs.

- c. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.

25a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit or otherwise, the Permittee shall submit a report to the Illinois EPA's Bureau of Air Compliance Section in Springfield, Illinois within thirty (30) days after the exceedance or deviation. The report shall identify the duration and the emissions impact of the exceedance or deviation, a copy of the relevant records and information to resolve the exceedance or deviation, and a description of the efforts to reduce emissions from, and the duration of exceedance or deviation, and to prevent future occurrences of any such exceedance or deviation.

- b. One (1) copy of required reports and notifications shall be sent to:

- i. Via mail or overnight delivery to:

Via USPS:

Illinois EPA, Bureau of Air
Compliance Section (MC 40)
2520 West Iles Ave
P.O. Box 19276
Springfield, IL 62794-9276

Via Other Means:

Illinois EPA, Bureau of Air
Compliance Section (MC 40)
2520 West Iles Ave
Springfield, IL 62704

- ii. In addition, a copy of notifications and reports required by this permit that concern emission testing and monitoring shall also be sent electronically to the Illinois EPA Request File Upload (<http://epa-smu-file-request.illinois.gov/>). If you are unable to use the Request File Upload, you may email the electronic version to EPA.BOA.SMU@Illinois.gov. The Permittee shall include the facility's ID Number on all correspondence.

This permit is issued based on the parts washer being exempt from the state permitting requirement pursuant to 35 Ill. Adm. Code 201.146(v) due to the vapor pressure of the solvent used does not exceed 0.7 kPa at 68 degrees Fahrenheit. This permit is issued based on the twenty-four (24) space heaters being exempt from the state permitting requirement pursuant to 201.146(d) as the aggregate design heat capacity is 5.28 MMBtu/hr, less than the exemption threshold maximum of 10 MMBtu/hr and the units are used for comfort heating.

Pursuant to 35 Ill. Adm. Code 201.146(b), an operating permit may not be issued until the equipment has been constructed or modified in accordance with applicable conditions in this construction permit. The Illinois EPA suggests that you apply for an operating permit after the construction is successfully completed in accordance with this permit. This information must be submitted in duplicate and should reference the application and I.D. numbers assigned above.

If you have any questions on this permit, please call Pinto Veliyath at 217/785-1705

William D. Marr /AP

William D. Marr
Manager, Permit Section
Bureau of Air

WDM:PTV:tan



Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor

James Jennings, Acting Director

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act, and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The Permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:
 - a. to enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. to have access to and copy any records required to be kept under the terms and conditions of this permit,
 - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. to obtain and remove samples of any discharge or emission of pollutants, and
 - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
 - b. 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 proposed facilities,
 - c. does not release the Permittee from compliance with the other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

- e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
- 6.
- a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.
 - b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
- a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or
 - b. upon finding that any standard or special conditions have been violated, or
 - c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.