



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JAMES JENNINGS, ACTING DIRECTOR

217/785-1705

## CONSTRUCTION PERMIT

### PERMITTEE

International Paper Co  
Attn: Michael Carter  
3001 Otto St.  
Belleville, IL 62226

Application No.: 23090012

I.D. No.: 163010AEZ

Applicant's Designation:

Date Received: September 18, 2023

Subject: Corrugator and Printing Process Replacement

Date Issued: January 8, 2025

Location: 3001 Otto St., Belleville, St. Clair County 62226

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of one (1) Three-Color Die Cutter (DC) and modify one (1) Corrugator (#0982), 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 construction of a Three-Color Die Cutter (DC) and the modification of Corrugator (#0982) 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 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 emission of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the Three-Color Die Cutter (DC) and the Corrugator (#0982) being less than 100 tons per year for Volatile Organic Material (VOM), 10 tons/year of any single HAP, and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs and VOM from the above-listed equipment not triggering the requirements of Section 112(g) of the Clean Air Act.
- 2a. The Corrugator (#0982) is 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.

2125 S. First Street, Champaign, IL 61820 (217) 278-5800  
115 S. LaSalle Street, Suite 2203, Chicago, IL 60603  
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120  
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000

595 S. State Street, Elgin, IL 60123 (847) 608-3131  
2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200  
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022  
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

- 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.
- d. The Corrugator (#0982) is 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).
- e. 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

- f. 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.

3. The Three-Color Die Cutter (DC) and the Corrugator (#0982) are subject to 35 Ill. Adm. Code Part 219 Subpart F (Coating Operations). Pursuant to 35 Ill. Adm. Code 219.204(c)(2), except as provided in 35 Ill. Adm. Code 219.205, 219.207, 219.208, 219.212, 219.215 and 219.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Paper Coating. Except as otherwise provided in 35 Ill. Adm. Code 219.204(a), (c), (g), (h), (j), (l), (n), (o), and (q), compliance with the emission limitations is required on and after March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with this Subpart must be demonstrated

through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 219.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 219.211(c), except where noted. (Note: The equation presented in 35 Ill. Adm. Code 219.206 shall be used to calculate emission limitations for determining compliance by add-on controls, credits for transfer efficiency, emissions trades and crossline averaging). The emission limitations are as follows:

On and after May 1, 2011	kg VOM/kg (1b VOM/lb) solids applied	kg VOM/kg (1b VOM/lb) coatings applied
i. Pressure sensitive tape and label surface coatings	0.20	(0.067)
ii. All other paper coatings	0.40	(0.08)
4a. This permit is issued based on the Three-Color Die Cutter (DC) and the Corrugator (#0982) at this source not being subject to the National Emission Standards 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 on the Three-Color Die Cutter (DC) and the Corrugator (#0982) at this source not being subject to the NESHAP for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ. Pursuant to 40 CFR 63.3330(b), any web coating line that is a product and packaging rotogravure or wide-web flexographic press under 40 CFR 63 Subpart KK (National Emission Standards for The Printing and Publishing Industry) which is included in the affected source under 40 CFR 63 Subpart KK are not part of the affected source of 40 CFR 63 Subpart JJJJ.		
5a. This permit is issued based on the use of cleaning solvents associated with the Three-Color Die Cutter (DC) and the Corrugator (#0982) at this source not being subject to the material and control requirements under 35 Ill. Adm. Code 219.187 (Other Industrial Solvent Cleaning Operations). Pursuant to 35 Ill. Adm. Code 219.187(a) (2) (B) (vii), notwithstanding 35 Ill. Adm. Code 219.187(a) (1): Cleaning operations for emission units within the following categories shall be exempt from the requirements of 35 Ill. Adm. Code 219.187(b), (c), (d), (e), (f), and (g);		
Paper, film, and foil coating;		
b. This permit is issued based on the Three-Color Die Cutter (DC) and the Corrugator (#0982) at this source not being subject to 35 Ill. Adm. Code Part 219 Subpart G (Use of Organic Material). Pursuant to 35 Ill. Adm. Code 219.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 is required to meet the limitations of 35 Ill. Adm. Code Part 219 Subpart G (35 Ill. Adm. Code		

219.301 or 219.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 219.204.

- c. This permit is issued based upon the Three-Color Die Cutter (DC) and the Corrugator (#0982) at this source not being subject to 35 Ill. Adm. Code Part 219 Subpart JJ (Miscellaneous Industrial Adhesives). Pursuant to 35 Ill. Adm. Code 219.900(b)(1)(E), notwithstanding 35 Ill. Adm. Code 219.900(a), the requirements of this 35 Ill. Adm. Code Part 219 Subpart JJ shall not apply to miscellaneous industrial adhesive application operations associated with paper, film, and foil coatings.
  - d. This permit is issued based on the Corrugator (#0982) not being subject to the control requirements of 35 Ill. Adm. Code 219 Subpart PP (Miscellaneous Fabricated Product Manufacturing Processes) because the source has maximum theoretical emissions of less than 100 tons per calendar year of VOM. This is a result of the federally enforceable production and operating limitations of this permit, which restrict the maximum theoretical emissions of VOM emissions to less than 100 tons per year.
- 6a. Pursuant to 35 Ill. Adm. Code 219.218(a), on and after May 1, 2011, every owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 219.204(c) shall:
- i. Store all VOM-containing cleaning materials in closed containers;
  - ii. Ensure that mixing and storage containers used for VOM-containing materials are kept closed at all times except when depositing or removing those materials;
  - iii. Minimize spills of VOM-containing cleaning materials;
  - iv. Convey VOM-containing cleaning materials from one location to another in closed containers or pipes; and
  - v. Minimize VOM emissions from the cleaning of storage, mixing, and conveying equipment.
- b. Pursuant to 35 Ill. Adm. Code 219.402(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 219.401 because of the criteria in 35 Ill. Adm. Code 219.402 is subject to the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 219.404(b) and (f), as applicable.
7. 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.
- 8a. Emissions from and operation of the two (2) Flexo Folder Gluers and the Three-Color Die Cutter (DC) shall not exceed the following limits:

<u>Materials</u>	<u>Coverage</u> (lbs/MMin <sup>2</sup> )	<u>Throughput</u> (Msf/Yr)	<u>Pollutant</u>	<u>Weight</u> <u>Percent</u> (%. by Wt.)	<u>Emissions</u> (Lbs/Hr)	<u>Emissions</u> (Tons/Yr)
Printing Ink	2.5	5,150,880	VOM	0.69	1.46	6.40
			HAPs	0.51	1.08	4.73
Adhesives	1.0	5,150,880	VOM	2.10	1.78	7.79
			HAPs	0.00	0.0	0.00
Totals:			VOM			14.19
			HAP			4.73

These limits are based on the maximum usage of ink and adhesives.

- b. Emissions from and operation of the Corrugator (#0982) shall not exceed the following limits:

<u>Process</u>	<u>Throughput</u>		<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
	(Msf/Mo)	(Msf/Yr)		(lbs/Msf)	(Lbs/hr)	(Tons/Yr)
Corrugator	429,240	5,150,880	VOM	0.0047	2.76	12.1
			Combined HAPS	0.000065	1.62	7.08
			Single HAP	0.000078	1.18	5.15*

\* Methanol

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.

- c. Emissions from and operation of the Scrap/Trim Reclamation System (Cyclone Separator) shall not exceed the following limits:

<u>Process</u>	<u>Throughput</u>		<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
	(Tons/Mo)	(Tons/Yr)		(lbs/Ton)	(Lbs/hr)	(Tons/Yr)
Scrap Reclamation	4,000	48,000	PM	2.10	11.5	50.4
			PM <sub>10</sub>	0.36	1.97	8.64
			PM <sub>2.5</sub>	0.006	0.329	1.44

These limits are based on the maximum throughput and the manufacturer's emission factor.

- d. 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).
- 9a. 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 Conditions 10 and 11 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
10. 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.
  11. Pursuant to 35 Ill. Adm. Code 219.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 219.105 to establish the records required under 35 Ill. Adm. Code 219.211.
  12. 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.

13. 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.
- 14a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. Usage of inks, coatings, glues and solvents (tons/month and tons/year);
  - ii. VOM and HAP contents of the inks, coatings, glues, and solvents used (% by weight);
  - iii. Corrugator throughput (ft<sup>2</sup>/month and ft<sup>2</sup>/year);
  - iv. Amount of Scrap Reclaimed (tons/month and tons/year);
  - v. Monthly and annual emissions of PM, PM<sub>10</sub>, VOM and HAPs (individual and combined) from the Three-Color Die Cutter (DC), Corrugator, and Scrap Reclaimed System, with supporting calculations (tons/month and tons/year).
- b. All records and logs required by Condition 14(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 an Illinois EPA or USEPA request for records during the course of a source inspection.
15. 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.



16. The Permittee shall submit a written notification to the Illinois EPA, Bureau of Air, Compliance Section Manager, of the initial startup of the emission units and associated pollution control equipment covered under this permit within thirty (30) calendar days of the initial start-up.
- 17a. 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:

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

ii. In addition to the paper copy of the test notifications, written test plan and final test report, an electronic copy of the test notifications, written test plan and final test report shall be sent to:

[epa.boa.smu@illinois.gov](mailto:epa.boa.smu@illinois.gov)

If you have any questions about this permit, please contact Alicia Huntley at 217/785-1705.

*William D. Marr/xr*

William D. Marr  
Manager, Permit Section  
Bureau of Air

WDM:ALH:tan



STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF AIR POLLUTION CONTROL  
P. O. BOX 19506  
SPRINGFIELD, ILLINOIS 62794-9506

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

July 1, 1985

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.



## PERMIT CALCULATION SHEET

Facility: International Paper Company	I.D. 163010AEZ
Anal. Eng.: ALH	Date: 09/28/2023
Rev. Eng.:	Date Rec.: 09/18/2023

**Section 1:** Identify noted File Traveler Sheet and ICEMAN source information that may affect permit issuance; if active VN indicate if Compliance is ok with issuance of a permit or NOI/Denial letter:

\*\*The facility indicates that there be increase in capacity of the corrugator, and by looking at table B-1, there are significant increases for several pollutants. Source has completed modeling; IEPA memo dated 11/7/2024. Source is located in St. Clair County, which is in a non-attainment area.

<b>LEGAL:</b>	None
<b>FOS FLAG:</b>	None
<b>CROPA:</b>	None
<b>Other</b>	This is an EJ source - EJ Review Request #6477

**Section 2:** Identify type of permit and brief summary of application/permit history if submitted in response to a NOI/Denial letter or to request revision to an existing permit:

This source has submitted an application for a Construction Permit. The current FESOP was issued 08/10/2022 and expires 8/10/2032.

IP owns and operates a corrugated box manufacturing facility in Belleville, St. Clair County. Primary operations: corrugating, printing, folding, and gluing material.

The source wishes to:

- **Construct a new Three-Color Die Cutter (DC) - will replace 2 existing die cutters and a flexo folder gluer.**
- Modify existing corrugator to increase production capacity. Will increase capacity from 900 ft/min to 1,200 ft/min.
- Update PTE to PM for existing Cyclone separator to reflect new PM emissions factor (no modifications to cyclone separator) - was exempt before b/c it was <0.1 lb/hr / 0.44 tons/yr.

**Section 3:** Description of the source with an itemized list of emission units and pollution control equipment included in the application. If for an operating permit, list all existing and proposed units and equipment that the operating permit will need to address:

Modifications to existing FESOP:

One (1) Scrap/Trim Reclamation System with nine (9) Pick Up Points to one (1) Cyclone;  
 ← update PM limit for cyclose separator to reflect new PM emission factor (no longer exempt)  
 One (1) Corrugator (#0982); ← modified to increase production capacity from 900 to 1,200 ft/min

New:

One (1) Three-Color Die Cutter

**Section 4:** Identify the proposed type(s) and maximum actual operating quantities and rates of pollutant containing materials to be used/processed/produced that will be included in permit:

From previous calc sheet:

Natural Gas Throughput: 16.8 mmscf/hr  
 Flexo Folder Gluers: 961,690 MMin<sup>2</sup>/Yr ink and 961,690 MMin<sup>2</sup>/Yr adhesives  
 Die Cutter: 311,576 MMin<sup>2</sup>/Yr ink and 311,576 MMin<sup>2</sup>/Yr adhesives  
 Corrugator: 2,580 10<sup>6</sup>ft<sup>2</sup>/yr  
 Cyclone: 48,000 tons/yr

**Section 5:** Identify the proposed type(s), quantities and rates of maximum actual operating emissions for the source to be included in the permit including the units/controls proposed. Identify the source(s) of the emission factors used:

Cyclone Separator: The Facility requests that PM limits for the Scrap/Trim Reclamation System be increased to reflect the current PTE calculations. The use of newly published emissions factors from the National Council for Air and Stream Improvement (NCASI) results in an increase in PM potential emissions from the Cyclone Separator in excess of the current permitted limit of 9.41 tpy.

**Section 6:** Identify the source's potential-to-emit (PTE) including any proposed additions/revisions. Show calculations or reference where in application or file PTE is satisfactorily presented. Emissions from 35 IAC 201.146 exempt units must be included in PTE calculations:

Existing Limits per 2022 FESOP:

Emission Unit	E M I S S I O N S (Tons/Year)						
	CO	NO <sub>x</sub>	PM	SO <sub>2</sub>	VOM	Single HAP	Combined HAPs
Boiler and Heating System	6.03	7.21	0.55	0.07	0.40		
Flexo Folder Gluers					18.39	6.27	6.27
Die Cutters					5.96	2.04	2.04
Corrugator			7.31		9.75		
Scrap Reclamation (Cyclone Separator)			24.52				
Storage Silo	--	--	0.44	--	--	--	--
<b>Totals</b>	<b>6.03</b>	<b>7.21</b>	<b>32.82</b>	<b>0.07</b>	<b>34.50</b>	<b>8.31</b>	<b>8.31</b>

Proposed PTE, per Table B-1 in application:

Emission Unit	E M I S S I O N S (Tons/Year)						
	CO	NO <sub>x</sub>	PM	SO <sub>2</sub>	VOM	Single HAP	Combined HAPs
Flexo - Post					15.8	5.41	5.41
Die-Cutters - Post					16.6	5.66	5.66
Corrugator - Post					19.5	6.27	6.27
Cylone Separator - Post			50.4				
<b>Totals</b>	<b>--</b>	<b>--</b>	<b>50.4</b>	<b>--</b>	<b>52.30</b>	<b>17.34</b>	<b>17.34</b>

Based on 8,760 hrs/yr

Per Modeling, limits for Construction Permit have been revised as follows:

<u>Emission Unit</u>	<u>PM</u>	<u>PM<sub>10</sub></u>	<u>PM<sub>25</sub></u>	<u>VOM</u>	<u>Single HAP</u>	<u>Comb. HAPs</u>
Flexo Folder Gluers and Die-Cutter				14.19	----	4.73
Corrugator				12.10	5.15*	7.08
Scrap/Trim Reclamation System (Cyclone Separator)	50.4	8.64	1.44			

\*Methanol

## CALCULATION SHEET

Section 7: List potentially applicable State and Federal (NSPS and NESHAP) regulations and indicate if application demonstrated those regulations would not be violated by construction and/or operation of equipment/units/processes in application:

- NSPS (New Source Performance Standards) - 40 CFR 60
  - No specific NSPS apply to the proposed project.
  
- NESHAP (National Emission Standards for Hazardous Air Pollutants) - 40 CFR 61, 63
  - The Facility is not subject to any 40 CFR Part 61 requirements.
  - The Facility is an area source of HAP, so is subject to 40 CFR Part 63 requirements.
  
- State - IPCB (Illinois pollution Control Board) - Title 35
  - Subject to Title 35 IAC Subtitle B Chapter I Part 201
  - Subject to Title 35 IAC Subtitle B Chapter I Part 212
  -

Section 8: Conclusions and recommendations. Indicate your final recommendation (e.g., NOI, denial, issue permit with conditions, etc.) and indicate reason(s) for that action:

It is recommended that this Construction Permit be issued.





Permit Applicant: International Paper Company

ID#: 163010AEZ;

Application#: 90090035 / 23090012

Date received: 09/18/2023; 30<sup>th</sup> day (NOI. deadline): 10/18/2023; 90<sup>th</sup> day: 12/17/2023

Analyst: ALH;

Date Checklist Completed: 09/28/2023 – 11/12/2024

Permit Application Completeness Screening Questions	Yes/No/NA
1. Does the application include a cover letter or project narrative that describes what the applicant is requesting a permit for (e.g., construct/operate two tanks, etc.)?	Y
2. Have the applicable signature application forms (APC 200P/628/629, etc.) been completed and signed and dated by the applicant?	Y
3. For a construction permit application, was correct construction permit fee paid? a. If no fee or incorrect fee paid, call applicant, and tell them to submit it and revised 197-FEE Form within one week's time. If not received within one week, prepare an Additional Fee Letter.	Y
4. For a construction permit application, does the APC-200P/628/629 form indicate if the emission unit has already been constructed? If it does, does it indicate date constructed? Denial will be needed if already constructed.	N/A
5. If a construction permit required testing prior to issuance of an operating permit: a. Have the required test results been received by the IEPA? b. Has Compliance Section reviewed the test results or have you requested their review of the test results? c. Did the test results indicate compliance with limits?	N/A
6. For existing sources requesting revision, does ICEMAN show current permit(s) for source issued to the same applicant identified on the form(s) in 2 above?	Y
7. Does the application indicate or can you determine what the potential to emit (PTE) is for the source (including HAPs), including requested modifications?	Y
8. Does the application state or can you determine if the subject project's process, equipment or source is subject to the NSPS in 40 CFR Part 60, or NESHAP in 40 CFR Parts 61 and 63, or RACT in 35 IAC 218/219 Subparts AA-TT?	Y
9. Does the application propose and clearly identify the annual and short-term emission limits <u>and</u> associated material throughput/usage limits and emission factors to be included in their new/revised permit?	Y
10. a. Does application identify county <u>and</u> township <u>and</u> SIC code of source? If not, call applicant and tell them to submit that information. b. Is source subject to either 212.302(a) <u>or</u> (b)? If so, does application describe how source will comply with the additional PM requirements?	Y N/A
11. If source is in an EJ area, is EJ outreach complete and EJ outreach completion email from EJ officer in file?	Y
12. If permit was due today, could you write an enforceable permit with application?	Y
13. Does the application request a change of operating permit from a CAAPP Title V or FESOP to a Lifetime Operating Permit?	N

If a No answer in Boxes 1-12 or Yes answer in Box 13, or not clear what the appropriate response is to a question, discuss the application with your supervisor. 11022015.



**COMPLETENESS REVIEW WORKSHEET  
FOR CONSTRUCTION PERMIT FEES**

FACILITY: <u>International Paper Company Belleville</u> ID NO.: <u>163010AEZ</u> APPLICATION NO.: <u>23090012</u> DATE REC'D: <u>09/18/2023</u> ANALYST: <u>ALH</u>	IDENTIFICATION OF REVIEW NUMBER (CIRCLE): 1 2 3 4 5 6 7 8 <input checked="" type="checkbox"/> INITIAL COMPLETENESS REVIEW <input type="checkbox"/> SUPPLEMENTAL SUBMITTAL (DATE): ___/___/___ <input type="checkbox"/> OTHER TRIGGER (DESCRIBE): _____
--	--

TYPE OF SOURCE		
<input type="checkbox"/> MAJOR	<input checked="" type="checkbox"/> SYNTHETIC MINOR HAVE FESOP? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> NON-MAJOR

COMPLETENESS REVIEW FOR TECHNICAL INFORMATION	
<input type="checkbox"/> INCOMPLETE (DESCRIBE): _____ <hr/> ACTION TO BE TAKEN <input type="checkbox"/> CALL <input type="checkbox"/> REQUEST ADDITIONAL INFORMATION <input type="checkbox"/> REJECT <input type="checkbox"/> DENY ACTION COMPLETED: ___/___/___      "DAY": ____	<input checked="" type="checkbox"/> APPLICATION COMPLETE

COMPLETENESS REVIEW FOR FEES											
<input type="checkbox"/> INADEQUATE <input type="checkbox"/> UNCERTAIN	<input checked="" type="checkbox"/> CORRECT <input type="checkbox"/> OVERPAID (DESCRIBE): _____ _____										
ACTION TO BE TAKEN <input type="checkbox"/> CONTINUE WITH TECHNICAL REVIEW <input type="checkbox"/> REQUEST TECHNICAL INFO (SEE ABOVE) <input type="checkbox"/> REQUEST TECHNICAL INFO & UPDATED FEE INFO (SEE ABOVE) <input type="checkbox"/> BILL & CONTINUE WITH TECHNICAL REVIEW <input type="checkbox"/> BILL & NO TECHNICAL REVIEW (EXPLAIN): _____ _____	BILL AMOUNT <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:70%;"></th> <th style="width:30%; text-align: right;">AMOUNT</th> </tr> </thead> <tbody> <tr> <td>1. <u>New emission unit</u></td> <td style="text-align: right;">\$ <u>4,000.00</u></td> </tr> <tr> <td>2. <u>Additional emission unit</u></td> <td style="text-align: right;">\$ <u>1,000.00</u></td> </tr> <tr> <td>3. _____</td> <td style="text-align: right;">\$ _____</td> </tr> <tr> <td style="text-align: right;"><b>TOTAL:</b></td> <td style="text-align: right;"><b>\$ <u>5,000.00</u></b></td> </tr> </tbody> </table> BILL DATE: ___/___/___      "DAY": ____		AMOUNT	1. <u>New emission unit</u>	\$ <u>4,000.00</u>	2. <u>Additional emission unit</u>	\$ <u>1,000.00</u>	3. _____	\$ _____	<b>TOTAL:</b>	<b>\$ <u>5,000.00</u></b>
	AMOUNT										
1. <u>New emission unit</u>	\$ <u>4,000.00</u>										
2. <u>Additional emission unit</u>	\$ <u>1,000.00</u>										
3. _____	\$ _____										
<b>TOTAL:</b>	<b>\$ <u>5,000.00</u></b>										

INITIALS		
ANALYST: <u>ALH</u>	DATE: <u>09/28/2024</u>	COMMENTS: <u>\$5,000 received 09/15/2023</u>
REVIEW: _____	DATE: ___/___/___	COMMENTS: _____

NOTES: \_\_\_\_\_  
 \_\_\_\_\_

CIRCLE THE START DATE  
 SQUARE THE STOP DATE

INITIAL START DATE \_\_\_\_\_  
 DAYS ALLOWED 90/180 \_\_\_\_\_

DATE FINAL ACTION MUST BE TAKEN BY: \_\_\_\_\_  
 (to be completed after payment received)

1	2	3	4	5	6	7	8	9	10	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
11	12	13	14	15	16	17	18	19	20	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
21	22	23	24	25	26	27	28	29	30	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
31	32	33	34	35	36	37	38	39	40	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
41	42	43	44	45	46	47	48	49	50	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
51	52	53	54	55	56	57	58	59	60	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
61	62	63	64	65	66	67	68	69	70	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
71	72	73	74	75	76	77	78	79	80	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
81	82	83	84	85	86	87	88	89	90	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
91	92	93	94	95	96	97	98	99	100	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
101	102	103	104	105	106	107	108	109	110	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
111	112	113	114	115	116	117	118	119	120	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
121	122	123	124	125	126	127	128	129	130	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
131	132	133	134	135	136	137	138	139	140	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
141	142	143	144	145	146	147	148	149	150	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
151	152	153	154	155	156	157	158	159	160	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
161	162	163	164	165	166	167	168	169	170	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____
171	172	173	174	175	176	177	178	179	180	START _____ STOP _____	DOWN PERIOD _____ DAYS REMAINING _____