

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

PEOPLE OF THE STATE OF ILLINOIS,)
)
Complainant,)
)
v.)
)
FELLOWES MANUFACTURING COMPANY,)
a/k/a FELLOWES, INC.,)
an Illinois corporation,)
)
Respondent.)

SEP 27 2004

STATE OF ILLINOIS
Pollution Control Board

PCB No. 04-193
(Enforcement-Air)

NOTICE OF FILING

To: Bridget M. Carlson
Office of the Attorney General
188 W. Randolph St./20th floor
Chicago, IL 60601

Dorothy M. Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph St./Suite 11-500
Chicago, IL 60601

Bradley P. Halloran, Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center, Suite 11-500
100 W. Randolph Street
Chicago, Illinois 60601

PLEASE TAKE NOTICE that I have today filed with the Clerk of the Illinois Pollution Control Board my APPEARANCE and FELLOWES' ANSWER TO COMPLAINT on behalf of Respondent, Fellowes Manufacturing Company, a copy of which is herewith served upon you.

FELLOWES MANUFACTURING COMPANY

By: Susan V. Harris
Susan V. Harris
One of its Attorneys

Date: September 27, 2004

Susan V. Harris
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APPEARANCE

I hereby file my appearance in this proceeding, on behalf of Fellowes Manufacturing Company.

By: Susan V Harris
Susan V. Harris

Susan V. Harris
Sidley Austin Brown & Wood LLP
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FELLOWES' ANSWER TO COMPLAINT

Respondent Fellowes Manufacturing Company, a.k.a. Fellowes, Inc.

("Fellowes"), through its attorneys, Sidley Austin Brown & Wood LLP, hereby provides its Answer to the Complaint of the People of the State of Illinois ("State") as follows:

COUNT I

FAILURE TO OBTAIN A CONSTRUCTION PERMIT

1. This count is brought on behalf of the PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, on her own motion and at the request of the Illinois EPA, pursuant to Section 31 of the Illinois Environmental Protection Act ("ACT"), 415 ILCS 5/31 (2002).

ANSWER:

Fellowes admits the allegations in paragraph 1.

2. The Illinois EPA is an agency of the State of Illinois created by the Illinois General Assembly in Section 4 of the Act, 415 ILCS 5/4 (2002), and charged *inter alia*, with the duty of enforcing the Act.

ANSWER:

The allegations in paragraph 2 contain conclusions of law to which no response is required.

3. At all times relevant to this Complaint, Fellowes Manufacturing Company, a/k/a Fellowes, Inc. ("Fellowes") is and was an Illinois corporation in good standing.

ANSWER:

Fellowes admits the allegations in paragraph 3.

4. At all times relevant to this complaint, Fellowes engaged in the manufacture, assembly, and packaging of office supplies, as well as the manufacture of cardboard boxes with or without printed images, at its manufacturing plant located at 1789 Norwood Avenue, Itasca, DuPage County, Illinois ("facility").

ANSWER:

Fellowes admits that at all times relevant to this complaint, it engaged in the manufacture, assembly, and packaging of office supplies, as well as the manufacture of corrugated boxes without printing or with minimal print coverage, at its plant located at 1789 Norwood Avenue, Itasca, DuPage County, Illinois ("facility"). By way of further answer, Fellowes states that by approximately March 26, 2003, it had ceased all injection molding operation at its facility. Fellowes denies all remaining allegations in paragraph 4.

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5. Fellowes began operating its facility prior to 1990 on a date better known to it, and from that time operations at the facility included 15 injection molding machines and two flexographic printing lines. Beginning in 1995, Fellowes operated two additional flexographic printing lines.

ANSWER:

Fellowes admits that it began operating its facility prior to 1990, and that at certain times its operations included 15 injections molding machines and two flexographic printing lines. Beginning in 1995, it operated a third flexographic printing line and, beginning in 1996, it operated a fourth flexographic printing line.

6. Fellowes' operation of its 15 injection molding machines and its four flexographic printing lines results in the emission of volatile organic materials ("VOMs"), also known as volatile organic compounds ("VOCs").

ANSWER:

Fellowes admits that the operation of its four flexographic printing lines result in the emission of small amounts of VOMs. By way of further answer, Fellowes states that the amount of VOMs emitted from its flexographic printing lines are below the limits allowed under applicable regulations. In addition, the facility has consistently used water-based inks in its printing lines. Fellowes further admits that historic operation of its injection molding machines resulted in the emission of small amounts of VOMs. By approximately March 26, 2003, Fellowes had ceased all injection molding manufacturing operations at its facility. Fellowes denies any remaining allegations in paragraph 6.

7. Respondent's operation of its facility is subject to the Act and the rules and regulations promulgated by the Illinois Pollution Control Board ("Board") and the Illinois EPA. The Board's regulations for air pollution are found in Title 35, Subtitle B, Chapter I of the Illinois Administrative Code ("Board Air Pollution Regulations"), and the Illinois EPA rules and regulations for air pollution are found in Title 35, Subtitle B, Chapter II of the Illinois Administrative Code ("Illinois EPA Air Pollution Regulations").

ANSWER:

The allegations in paragraph 7 contain conclusions of law to which no response is required.

8. Sections 9(b) of the Act, 415 ILCS 5/9(b) (2002), provide as follows:

No person shall:

b. Construct, install, or operate any equipment facility, vehicle, vessel or aircraft capable of causing or contributing to air pollution or designed to prevent air pollution, of any type designated by Board regulations, without a permit granted by the Agency, or in violation of any conditions imposed by such permit.

ANSWER:

The allegations in paragraph 8 contain conclusions of law to which to response is required.

9. Section 201.142 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.142, provides as follows:

No person shall cause or allow the construction of any new emission source of 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

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construction permit from the Agency, except as provided in Section 201.146 or Section 201.170(b) of this Part.

ANSWER:

The allegations in paragraph 9 contain conclusions of law to which no response is required.

10. Section 3.315 of the Act, 415 ILCS 5/3.315 (2002), contains the following definition:

“PERSON” is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency or any other legal entity, or their legal representative, agent or assigns.

ANSWER:

The allegations in paragraph 10 contain conclusions of law to which no response is required.

11. Respondent Fellowes, is a “person” as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315(2002).

ANSWER:

Fellowes admits the allegations in paragraph 11.

12. Section 3.165 of the Act, 415 ILCS 5/3.165 (2002), provides as follows:

“Contaminant” is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

ANSWER:

The allegations in paragraph 12 contain conclusions of law to which no response is required.

13. VOM is a “contaminant” as that term is defined in Section 3.165 of the Act, 415 ILCS 5/3.165 (2002).

ANSWER:

The allegations in paragraph 13 contain conclusions of law to which no response is required.

14. Section 201.102 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.102, contains the following definitions:

“Emission source”: any equipment of facility of a type capable of emitting specified air contaminants to the atmosphere.

“Specified air contaminant”: any air contaminant as to which this Subtitle contains emission standards or other specific limitations and any contaminant regulated in Illinois pursuant to Section 9.1 of the Act.

ANSWER:

The allegations in paragraph 14 contain conclusions of law to which no response is required.

15. VOM is a “specified air contaminant” as that term is defined in Section 201.102 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.102.

ANSWER:

The allegations in paragraph 15 contain conclusions of law to which no response is required.

16. Fellowes' 15 injection molding machines and its four flexographic printing lines are "emission source[s]" as that term is defined in Section 201.102 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.102.

ANSWER:

The allegations in paragraph 16 contain conclusions of law to which no response is required.

17. Fellowes, on dates better known to it, installed four flexographic printing lines and 15 injection molding machines in its facility in the late 1980's or early 1990's.

ANSWER:

Fellowes admits that in the late 1980's, it installed two flexographic printing lines at its facility. Fellowes further states that in approximately January 1995 it installed a third flexographic printing line, and in approximately June 1996 it installed a fourth flexographic printing line. Fellowes admits that in the late 1980's or early 1990's, it installed approximately 15 injection molding machines at its facility. Fellowes denies the remaining allegations in paragraph 17.

18. Fellowes did not obtain construction permits from the Illinois EPA prior to installing any of its 19 emission sources.

ANSWER:

Fellowes admits that it did not obtain air construction permits from the Illinois Environmental Protection Agency prior to installing its four flexographic printing lines and 15 injection molding machines.

19. By failing to obtain construction permits prior to the installation of its four flexographic printing lines and 15 injection molding machines, Fellowes violated Section 9(b) of the Act, 415 ILCS 5/9(b) (2002), and Section 201.142 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.142.

ANSWER:

The allegations in paragraph 19 contain conclusions of law to which no response is required.

COUNT II

FAILURE TO OBTAIN A STATE OPERATING PERMIT

1. – 16. Complainant realleges and incorporates by reference herein paragraphs 1 through 8 and paragraphs 10 through 17 of Count I as paragraphs 1 through 16 of this Count II.

ANSWER:

Fellowes reavers its answers to paragraphs 1 through 8 and 10 through 17 of Count I as its answers to paragraphs 1 through 16 of Count II.

17. Section 201.143 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.143, provides as follows:

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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 Section 201.142 without first obtaining an operating permit from the Agency, except for such testing operations as may be authorized by the construction permit. Applications for operating permits shall be made at such times and contain such information (in addition to the information required by Section 201.157) as shall be specified in the construction permit.

ANSWER:

The allegations in paragraph 17 contain conclusions of law to which no response is required.

18. Since sometime prior to 1990, the actual dates being better known to Fellowes, through April 1, 2003, Fellowes has been operating two flexographic printing lines and 15 injection molding machines without the required State operating permit.

ANSWER:

Fellowes admits that from between approximately sometime prior to 1990 through at least April 1, 2003, it operated two flexographic printing lines. Fellowes also admits that from between approximately sometime prior to 1990 through approximately March 26, 2003, it operated injection molding machines. By way of further answer, Fellowes states that by approximately March 26, 2003, all such operations at the facility had ceased. Fellowes admits that an air operating permit for its facility was issued on approximately April 1, 2003. The remaining allegations in paragraph 18 contain conclusions of law to which no response is required.

19. From 1995 through April 1, 2003, Fellowes has been operating an additional two flexographic printing lines without the required State operating permit.

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ANSWER:

Fellowes admits that beginning in approximately January 1995, it operated a third flexographic printing line. Beginning in approximately June 1996, it began operating a fourth flexographic printing line. Fellowes admits that an air operating permit for these two additional flexographic printing lines was issued on approximately April 1, 2003. The remaining allegations in paragraph 19 contain conclusions of law to which no response is required.

20. By operating its 15 injection molding machines and the four flexographic printing lines without a State operating permit until April 1, 2003, Fellowes violated Section 201.143 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.143.

ANSWER:

The allegations in paragraph 20 contain conclusions of law to which no response is required.

21. By violating Section 201.143 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.143, Fellowes violated Section 9(b) of the Act, 415 ILCS 5/9(b) (2002).

ANSWER:

The allegations in paragraph 21 contain conclusions of law to which no response is required.

COUNT III

FAILURE TO SUBMIT A CLEAN AIR ACT PERMIT PROGRAM APPLICATION

1. – 16. Complainant realleges and incorporates by reference herein paragraphs 1 through 8 and paragraphs 10 through 17 of Count I as paragraphs 1 through 16 of this Count III.

ANSWER:

Fellowes reavers its answers to paragraphs 1 through 8 and paragraphs 10 through 17 of Count I as its answers to paragraphs 1 through 16 of Count III.

17. Section 39.5(6)(b) of the Act, 415 ILCS 5/39.5(6)(b) (2002), provides as follows:

b. After the applicable CAAPP permit or renewal application submittal date, as specified in subsection 5 of this Section, no person shall operate a CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the Agency.

ANSWER:

The allegations in paragraph 17 contain conclusions of law to which no response is required.

18. Section 39.5(1) of the Act, 415 ILCS 5/39.5(1)(2002), contains the following definition:

“Major source” means a source for which emissions of one or more air pollutants meet the criteria for major status pursuant to paragraph 2(c) of this Section.

ANSWER:

The allegations in paragraph 18 contain conclusions of law to which no response is required.

19. Section 39.5(2) (c) (iii) (A) of the Act, 415 ILCS 5/39.5(2) (c) (iii) (A) (2002), provides, in pertinent part as follows:

c. For purposes of this Section the term “major source” means any source that is:

A. For ozone nonattainment areas, sources with the potential to emit 100 tons or more per year of volatile organic compounds or oxides of nitrogen in areas classified as “marginal” or “moderate”, 50 tons or more per year in areas classified as “serious”, 25 tons or more per year in areas classified as “severe”, and 10 tons or more per year in areas classified as “extreme” ...

ANSWER:

The allegations in paragraph 19 contain conclusions of law to which no response is required.

20. DuPage County is designated as “severe” non-attainment for ozone.

ANSWER:

Fellowes lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 20.

21. Since at least March 1995, the effective date of the Clean Air Act Permit Program (“CAAPP”), Fellowes has had the potential to emit more than 25 tons per year of VOMs from its facility.

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ANSWER:

Fellowes states that since at least March 1995, the actual VOM emissions from its facility have been significantly below 25 tons per year. Fellowes denies the remaining factual allegations in paragraph 21. The remaining allegations of paragraph 21 contain conclusions of law to which no response is required.

22. Fellowes facility is a "major source" as that term is defined in Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2002).

ANSWER:

The allegations in paragraph 22 contain conclusions of law to which no response is required.

23. As a major source, Fellowes was required to submit a CAAPP permit application to the Illinois EPA no later than September 1995, but failed to do so until July 2002.

ANSWER:

Fellowes admits that it submitted a CAAPP permit application to the Illinois Environmental Protection Agency on approximately July 12, 2002. The remaining allegations in paragraph 23 contain conclusions of law to which no response is required.

24. By failing to timely submit an application for a CAAPP permit, Fellowes violated Section 39.5(6)(b) of the Act, 415 ILCS 5/39.5(6) (b) (2002).

ANSWER:

The allegations in paragraph 24 contain conclusions of law to which no response is required.

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COUNT IV

CONSTRUCTION OF A MAJOR STATIONARY SOURCE

IN VIOLATION OF NEW SOURCE REVIEW

1. – 18. Complainant realleges and incorporates by reference herein paragraphs 1 through 8 and paragraphs 10 through 18 of Count I, and paragraph 21 of Count III as paragraphs 1 through 18 of this Count IV.

ANSWER:

Fellowes reavers its answers to paragraphs 1 through 8 and paragraphs 10 through 18 of Count I, and paragraph 21 of Count III as its answers to paragraphs 1 through 18 of Count IV.

19. Section 9(a) of the Act, 415 ILCS 5/9(a) (2002), provides as follows:

No person shall:

a. Cause or threaten or allow the discharge or emission of any contaminant into the environment in any State so as to cause or tend to cause air pollution in Illinois, either alone or in combination with contaminants from other sources, or so as to violate regulations or standards adopted by the Board under this Act.

ANSWER:

The allegations in paragraph 19 contain conclusions of law to which no response is required.

20. Section 203.201 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 203.201, provides, in pertinent part, as follows:

In any nonattainment area, no person shall cause or allow the construction of a new major stationary source or major modification that is major for the pollutant for which the area is designated a nonattainment area,

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except as in compliance with this Part for that pollutant. In areas designated nonattainment for ozone, this prohibition shall apply to new major stationary sources of major modifications of sources that emit volatile organic material or nitrogen oxides....

ANSWER:

The allegations in paragraph 20 contain conclusions of law to which no response is required.

21. Section 203.206(b) (1) (C) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 203.206(b) (1) (C), provides, in pertinent part, as follows:

b. The following constitute a major stationary source:

1. For an area designated as nonattainment for ozone, a major stationary source is a stationary source which emits or has the potential to emit volatile organic material in amount equal to or greater than the following:

* * *

C. 25 tons per year in an area classified as severe nonattainment for ozone...

ANSWER:

The allegations in paragraph 21 contain conclusions of law to which no response is required.

22. Sometime during 1995, on dates better known to it, Fellowes constructed two flexographic printing lines each with the potential to emit greater than 25 tons per year of the contaminant VOM.

ANSWER:

Fellowes admits that in approximately January 1995, it installed a new flexographic printing line at its facility. Fellowes additionally states that in approximately June 1996, it installed another new flexographic printing line. Fellowes denies the remaining factual

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allegations in paragraph 22. The remaining allegations of paragraph 22 contain conclusions of law to which no response is required.

23. The addition of Fellowes' two additional flexographic printing lines created a potential net emissions increase of 101 tons per year of the contaminant VOM.

ANSWER:

Fellowes denies the factual allegations in paragraph 23. The remaining allegations of paragraph 23 contain conclusions of law to which no response is required.

24. The two flexographic printing lines constructed by Fellowes are major stationary sources as that term is defined in Section 203.206(b) (1) (C).

ANSWER:

The allegations in paragraph 24 contain conclusions of law to which no response is required.

25. Fellowes constructed two major stationary sources without first obtaining a construction permit and without demonstrating compliance with the Board's regulations pertaining to New Source Review in violation of Section 203.201 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 203.201.

ANSWER:

Fellowes denies the factual allegations in paragraph 25. The remaining allegations in paragraph 25 contain conclusions of law to which no response is required.

26. By violating Section 203.201 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 203.201, Fellowes violated Section 9(a) of the Act, 415 ILCS 5/9(a) (2002).

ANSWER:

The allegations in paragraph 26 contain conclusions of law to which no response is required.

COUNT V

FAILURE TO SUBMIT ANNUAL EMISSIONS REPORTS

1. – 17. Complainant realleges and incorporates by reference herein paragraphs 1 through 8 and paragraphs 10 through 17 of Count I, and paragraph 19 of Count IV as paragraphs 1 through 17 of this Count V.

ANSWER:

Fellowes reavers its answers to paragraphs 1 through 8 and paragraphs 10 through 17 of Count I, and paragraph 19 of Count IV as its answers to paragraphs 1 through 17 of Count V.

18. Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), provides as follows:

a. The owner or operator of any emission unit or air pollution control equipment, unless specifically exempted in this Section, shall submit to the Agency as a minimum, annual reports detailing the nature, specific emission units and total annual quantities of all specified air contaminant emissions; provided, however, that the Agency may require more frequent reports where necessary to accomplish the purposes of the Act and this Chapter.

ANSWER:

The allegations in paragraph 18 contain conclusions of law to which no response is required.

19. Section 254.132(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm.

Code 254.132(a), provides as follows:

a. Failure to file a complete Annual Emissions Report by the applicable deadlines prescribed in Section 254.137(a) of this Subpart shall be a violation of this Part and 35 Ill. Adm. Code 201.302(a).

ANSWER:

The allegations in paragraph 19 contain conclusions of law to which no response is required.

20. Since 1992, Fellowes as an owner operator, has been required to submit Annual Emissions Reports ("AERs") to the Illinois EPA by May 1 of each year.

ANSWER:

The allegations in paragraph 20 contain conclusions of law to which no response is required.

21. Fellowes failed to submit AERs for calendar years 1992 through 2001, until October 14, 2002.

ANSWER:

Fellowes admits that on approximately July 12, 2002, it submitted AERs for calendar years 1992 through 2001. Fellowes denies the remaining allegations in paragraph 21.

22. By failing to timely submit AERs for the calendar years 1992 through 2001, Fellowes violated Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a) and Section 254.132(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a).

ANSWER:

The allegations in paragraph 22 contain conclusions of law to which no response is required.

23. By violating Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a) of the Illinois Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a), Fellowes violated Section 9 (a) of the Act, 415 ILCS 9(a).

ANSWER:

The allegations in paragraph 23 contain conclusions of law to which no response is required.

RESERVATION OF RIGHT IN CONNECTION WITH SEPARATE DEFENSES

Fellowes reserves the right to assert separate defenses as discovery proceeds in this case.

* * * * *

Dated this 27th day of September, 2004.

By: Susan V. Harris
One of the Attorneys for Fellowes, Inc.

Susan V. Harris
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CERTIFICATE OF SERVICE

I, Susan V. Harris, an attorney, certify that I have served the attached NOTICE OF FILING, APPEARANCE, and FELLOWES' ANSWER TO COMPLAINT, on September 27, 2004 as follows:

Via hand delivery to:

Bridget M. Carlson
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188 W. Randolph Street
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Hearing Officer
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Susan V. Harris