



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

December 22, 2011

John Therriault
Assistant Clerk
Illinois Pollution Control Board
100 West Randolph St., Suite 11-500
Chicago, IL 60601

RECEIVED
CLERK'S OFFICE

DEC 28 2011

STATE OF ILLINOIS
Pollution Control Board

RE IEPA 12-7

Re: Grant of Provisional Variance with Conditions for Emissions of Volatile Organic Material and Operation of Regenerative Thermal Oxidizer at Ampac Flexicon, LLC, Cary Facility, Permit No., Source ID: 1110101AAT

Dear Mr. Therriault:

Attached please find a copy of a provisional variance that the Illinois Environmental Protection Agency ("Illinois EPA") granted to Ampac Flexicon, LLC, Cary Facility, Illinois. As you may know, the Illinois Environmental Protection Act requires the Illinois EPA to promptly file a copy of its provisional variance decisions with the Illinois Pollution Control Board. *See*, 415 ILCS 5/37(b). This letter and attachment fulfills the Illinois EPA's statutory obligation.

Sincerely,

Rachel Doctors
Assistant Counsel



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PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

December 22, 2011

Robert Flaherty, Technical Manager
Ampac Flexibles
165 Chicago Street
Cary, Illinois 60013

RECEIVED
CLERK'S OFFICE
DEC 28 2012
STATE OF ILLINOIS
Pollution Control Board

Re: Grant of Provisional Variance with Conditions for Emissions of Volatile Organic Material and Operation of Regenerative Thermal Oxidizer at Ampac Flexicon, LLC, Cary Facility, Permit No. 95090019, Source ID: 1110101AAT

Dear Mr. Flaherty:

On December 9, 2011, the Illinois Environmental Protection Agency ("Illinois EPA") received from Ampac Flexicon, LLC, Cary Facility ("Ampac"), a request for a provisional variance from the volatile organic material ("VOM") limits for the flexographic press and the laminators under Permit No. 95090019, while Ampac will be replacing its Regenerative Thermal Oxidizer ("RTO"). The request was accepted for review pursuant to the applicable requirements of the Illinois Environmental Protection Act ("Act") and applicable regulations.

The Illinois EPA has evaluated the request in accordance with the requirements of Sections 35, 36, and 37 of the Act and the Illinois EPA's regulations set forth at 35 Ill. Adm. Code Part 180. The Illinois EPA is granting Ampac's request for provisional variance, subject to the conditions delineated below, due to the short-term nature of the relief and because the request and supporting documentation have demonstrated that an arbitrary and unreasonable hardship would result in the event of a denial. The variance will be effective during the winter months; hence, the temporary increase in VOM emissions and relatively low hazardous pollutant emissions during the period of the provisional variance is expected to have minimal adverse environmental impacts. However, granting of the provisional variance will avoid a possible hardship to the facility if it was required to shutdown due to a failure of the RTO.

The Illinois EPA is granting Ampac relief in part from permit conditions 7.1.6(b) and 7.2.6 and the requirement to operate the RTO and the requirements of 35 Ill. Adm. Code Section 218.401 and 218.207 that require meeting certain VOM emissions limits as contained in Permit No. 95090019 for up to 45 days. Specifically, this relief is granted for 45 days that is expected to begin on January 9, 2012, and conclude no later than February 13, 2012, at which time this grant and its terms expire. This action affording relief is based, in principal part, upon Ampac's representation that no significant adverse environmental effect is expected as a result of the requested relief, subject to the following terms and conditions:

- 1) Ampac shall notify the Illinois EPA in writing before the shutting down the existing RTO at Ampac's Cary Facility, which will start on the outage at the Ampac Cary facility. Additionally, Ampac shall notify the Illinois EPA within seven days after the new RTO is installed and running to properly control VOM emissions. The report of the installation shall provide the dates and times of the installation.
- 2) This provisional variance only provides relief from the monthly VOM emission limit found in permit condition 7.1.6(b), the hourly VOM emission limit found in permit condition 7.2.6, the requirement to operate the RTO, and the requirements of 35 Ill. Adm. Code Section 218.401 and 218.207 that require meeting certain VOM emissions limits as contained in Permit No. 95090019 for up to 45 days. During the term of the provisional variance, VOM emissions may not exceed 60 tons. The provisional variance does not provide relief from any other terms or conditions in Permit No. 95090019, including the annual VOM emissions limitations in conditions 7.1.6(b) and 7.2.6.
- 3) Ampac shall maintain and submit to the Illinois EPA records of VOM emissions from the flexographic press and the laminators during the term of the provisional variance.
- 4) Reports and information required under paragraph 3 shall be submitted within 30 days after the term of the provisional variance to:

Illinois Environmental Protection Agency
Bureau of Air, Compliance Unit
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

- 5) Following the receipt of this provisional variance, Ampac shall submit a certification to the Illinois EPA signifying its acceptance of the terms and conditions expressed herein. The certification shall be mailed to the Illinois EPA within 10 days of the date of receipt of this provisional variance letter and must be signed by the owner or operator, as follows:

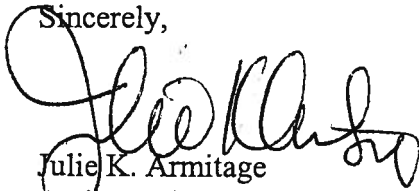
Certification

I (We) _____, read the terms and conditions of the Illinois EPA's provisional variance, dated December 22, 2011, and, I (we) hereby accept and agree to abide by the terms and conditions expressed therein.

The certification should be mailed, by certified mail, to the undersigned:

Julie K. Armitage
Acting Chief Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Il 62794-9276.

Sincerely,



Julie K. Armitage
Acting Chief Legal Counsel

cc:

Eric E. Boyd
Liz Ash
Seyfarth Shaw LLP
131 South Dearborn Street, Ste. 2400
Chicago, IL 60603