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STATE OF ILLINOIS  
Pollution Control Board

ILLINOIS POLLUTION CONTROL BOARD  
March 21, 2011

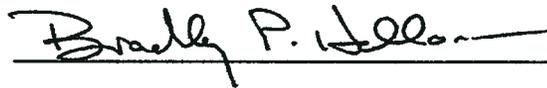
IN THE MATTER OF: )  
)  
PETITION OF GREIF PACKAGING, ) AS 11-1  
LLC., FOR AN ADJUSTED STANDARD ) (Adjusted Standard - Air)  
FROM 35 ILL. ADM. CODE PART 218 )  
SUBPART TT )

ORIGINAL

**HEARING OFFICER ORDER**

The hearing officer directs petitioner to address the pre-hearing questions attached to this order. Written responses to the Board's questions must be filed at least 30 days before the hearing. Prefiled testimony must be filed at least 14 days before the hearing. A hearing date will be scheduled when the parties decide how much time will be needed to prepare these documents. The Illinois Environmental Protection Agency's deadline for filing its recommendation is April 11, 2011.

IT IS SO ORDERED.



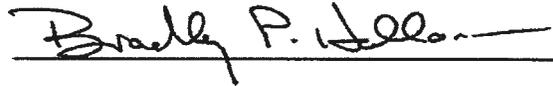
Bradley P. Halloran  
Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center, Suite 11-500  
100 West Randolph  
Chicago, Illinois 60601  
312.814.8917

CERTIFICATE OF SERVICE

It is hereby certified that true copies of the foregoing order were mailed, first class, on March 21, 2011, to each of the persons on the attached service list.

It is hereby certified that a true copy of the foregoing order was hand delivered to the following on March 21, 2011:

John T. Therriault  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph St., Ste. 11-500  
Chicago, Illinois 60601

A handwritten signature in black ink, reading "Bradley P. Halloran", is written over a horizontal line.

Bradley P. Halloran  
Hearing Officer  
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**AS 11-9 GREIF PACKAGING, LLC  
BOARD QUESTIONS FOR PETITIONER**

**35 IAC 104.406(g)**

1. Currently, the Illinois State Implementation Plan (SIP) relies on Reasonably Available Control Technology (RACT) for 35 IAC 218 Subpart TT sources, like Greif Packaging, that would require 81% capture and control reductions in VOM emissions. As the petition indicates, since Greif is proposing a 55% reduction in lieu of 81%, IEPA would need to submit an SIP revision to USEPA for approval. Greif indicated it will work with the Agency to submit the SIP revision. Pet. at 23.

Greif Packaging provided a “RACT Study” dated August 2010 addressing various compliance alternatives (Pet. Exh. A), however, the study did not include an ambient air quality impact analysis. Although the petition relates Greif’s maximum permitted VOMs to the Statewide and Chicago Area emissions (Pet. at 16.), Greif has not demonstrated that the proposed adjusted standard will not cause or contribute to violations of the National Ambient Air Quality Standard (NAAQS) for ozone or delay efforts to attain the NAAQS in a timely manner.

The hearing officer directs Greif to provide an Ambient Air Quality Impact Analysis for ozone as part of its petition to demonstrate that the proposed adjusted standard will not cause or contribute to violations of the NAAQS for ozone or delay efforts to attain the NAAQS in a timely manner. Greif should consult with the IEPA as to the necessary elements Greif should provide in the analysis to assure the IEPA has sufficient supporting documentation for the SIP revision request.

The Board notes that IEPA has previously relied on petitioners to conduct an Ambient Air Quality Impact Analysis for ozone using the “Scheffe Method”. See AS 04-1, In the Matter of: Petition of Crownline Boats, Inc. for an Adjusted Standard from 35 IAC 215.301 at 9-10, and Technical Document Section 5 and Appendix 16. See AS 09-4, In the Matter of: Petition of Royal Fiberglass Pools, Inc. for an Adjusted Standard from 35 IAC 215.301, Technical Document Section 6. See AS 09-4, Illinois EPA’s Response to Questions posed by the Illinois Pollution Control Board in the Matter of Royal Fiberglass Pools’ Petition for an Adjusted Standard, October 14, 2009 at 2. See also AS 09-4, Illinois EPA’s Response to Further Questions posed by the Illinois Pollution Control Board in the Matter of Royal Fiberglass Pools’ Petition for an Adjusted Standard, October 27, 2009 at 2.

The Scheffe method, formally known as “VOC/NOx Point Source Screening Tables”, by Richard D. Scheffe, USEPA, September 1988, can be found at:

<http://www.docstoc.com/docs/34211795/DISCLAIMER>

<http://ndep.nv.gov/bapc/permitting/download/model/scheffe.doc>

If Greif applies the Scheffe Method, Greif should consider the worst case scenario, using the maximum permitted VOM emissions. The analysis should also quantify the difference in emissions that would occur if Greif complied with 81% versus the 55% reduction based on past and projected annual emissions data. The analysis should provide a basis (such as an ozone increment or other basis as suggested by the IEPA) to indicate if the 55% reduction would constitute a significant increase over the 81% reduction due to the adjusted standard.

**35 IAC 104.406(f)**

2. Since the Ambient Air Quality Impact Analysis for ozone might be performed based on the assumption that 22.8 tons per year (tpy) would be the maximum VOM emitted from the QC Test Process, would you please comment on proposing a condition in the adjusted standard language that would limit VOMs to 22.8 tpy or less from the QC Test Process.