

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
PETITION OF GREIF, INC. AND	)	AS 2011-001
GREIF PACKAGING, LLC	)	
FOR AN ADJUSTED STANDARD FROM	)	(Adjusted Standard -- Air)
35 ILL ADM. CODE PART 218	)	
SUBPART TT	)	

**NOTICE OF ELECTRONIC FILING**

TO:

John Therriault, Clerk  
 Illinois Pollution Control Board  
 James R. Thompson Center  
 100 West Randolph Street, Suite 11-500  
 Chicago, IL 60601

Charles Matoesian  
 Division of Legal Counsel  
 Illinois Environmental Protection Agency  
 1021 North Grand Avenue East  
 P.O. Box 19276  
 Springfield, IL 62794-9276

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board, Petitioners' **NOTICE OF ELECTRONIC FILING, PROOF OF PETITION NOTICE REQUIREMENTS** and **CERTIFICATE OF SERVICE**, copies of which are attached herewith and served upon you.

Respectfully submitted,

GREIF, INC. and GREIF PACKAGING, LLC

By: /s/ Susan Charles  
 One of its Attorneys

Date: August 30, 2011

Thomas W. Dimond  
 Susan Charles  
 ICE MILLER LLP  
 200 West Madison Street  
 Suite 3500  
 Chicago, Illinois 60606

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**PROOF OF PETITION NOTICE REQUIREMENTS**

Pursuant to 35 Ill. Adm. Code Sections 104.408 and 104.410, on August 12, 2011, petitioners Greif, Inc. and Greif Packaging, LLC ("Greif") published notice of the filing of their Second Amended Petition for an Adjusted Standard ("Petition") by advertisement in a newspaper of general circulation in the area of Greif's Naperville plant. In support of this filing Greif states the following:

1. Greif filed the Petition with the Clerk of the Illinois Pollution Control Board on August 10, 2011.
2. Pursuant to the Petition, Greif seeks an adjusted standard from 35 Ill. Adm. Code § 218.986(a) as it applies to control requirements for emissions of volatile organic material at Greif's fiber drum manufacturing facility located in Naperville, Illinois.
3. On August 12, 2011, Greif published notice of the filing of the Petition by advertisement in the *Naperville Sun*, a newspaper of general circulation in Naperville, Illinois.
4. As required by 35 Ill. Adm. Code Section 104.408(a), Greif published notice of the filing of the Petition within 14 days after it filed the Petition.
5. The notice includes the specific language required by 35 Ill. Adm. Code Section 104.408(b).

6. As required by 35 Ill. Adm. Code Section 104.410, a certificate of publication issued by the publisher of the *Naperville Sun* certifying publication of the notice on August 12, 2011 is attached as Exhibit 1. The certificate of publication attaches Greif's notice as it appeared in the *Naperville Sun* and states that the *Naperville Sun* satisfies the requirements of the Illinois Notice by Publication Act, 715 ILCS 5/0.01, *et seq.* The language included in Grief's notice is consistent with 35 Ill. Adm. Code Section 104.408(b).

WHEREFORE, for the reasons stated above, Greif has satisfied the requirements for providing notice of the filing of its Second Amended Petition for an Adjusted Standard and for filing proof of such notice with the Illinois Pollution Control Board.

Respectfully submitted,

GREIF, INC. and GREIF PACKAGING, LLC

By: /s/ Susan Charles  
One of its Attorneys

Date: August 30, 2011

Thomas W. Dimond  
Susan Charles  
ICE MILLER LLP  
200 West Madison Street  
Suite 3500  
Chicago, Illinois 60606

Notice of Second Amended Petition by Greif Inc. and Greif Packaging LLC for an Adjusted Standard before the Illinois Pollution Control Board

Electronic Filing - Received, Clerk's Office, 08/30/2011

SUN-TIMES MEDIA Certificates of Publication

State of Illinois - County of [ ] Cook [ ] Kane [ ] Lake [ ] McHenry [x] DuPage [ ] Will [ ] DeKalb [ ] Kendall [ ] Grundy

Sun-Times Media, does hereby certify it has published the attached advertisements in the following secular newspapers. All newspapers meet Illinois Compiled Statute requirements for publication of Notices per Chapter 715 ILCS 5/0.01 et seq. R.S. 1874, P728 Sec 1, EFF. July 1, 1874. Amended By Laws 1959, P1494, and EFF. July 17, 1959. Formerly Ill. Rev. Stat. 1991, CH100, P1..

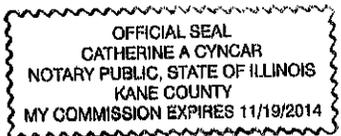
Note: Legal Notice appeared in the following checked positions.

PUBLICATION DATE(S): 8/12/11 1 time

- [ ] The Beacon News [ ] The Courier News [ ] The Herald News [ ] The Lake County News-Sun [x] The Naperville Sun [ ] The SouthTownStar [ ] The Chicago Sun-Times [ ] Pioneer Press/The Doings [ ] Job Posting on Monster.com

IN WITNESS WHEREOF, the undersigned, being duly authorized, has caused this Certificate to be signed and its official seal affixed at Aurora, Illinois

By [Signature] David Fontecha Public Legal Notices Account Executive



Subscribed and sworn to before me this 23 Day of Aug. A. D. 2011

By: [Signature] Catherine A. Cyncar Notary Public

On August 10, 2011, Greif, Inc. and Greif Packaging LLC (Greif) filed a Second Amended Petition for an Adjusted Standard (Petition) with the Illinois Pollution Control Board (Board), Docket Number 2011-001 seeking an adjusted standard from 35 Ill. Adm. Code § 218.986(a) as it applies to control requirements for emissions of volatile organic material (VOM) at Greif's facility located at 5 South 220 Frontenac Road, Naperville, Illinois 60563. Greif's Naperville facility manufactures fiber (paper) drums. Greif conducts quality control (QC) testing of polyethylene liners included in some drums by spraying a QC test fluid (a denatured alcohol product, which is a VOM) into the drum interior. The drums are conveyed to an inspection station for visual inspection and then conveyed to a third location for evaporation and removal of the QC test fluid. VOM is emitted throughout the QC Test Process, including drum conveyance. Section 218.986(a) would require Greif to install capture and control equipment which achieves an overall reduction in uncontrolled VOM emissions of at least 81% throughout Greif's QC Test Process. Greif's amended proposed adjusted standard provides the following: 1. The proposed adjusted standard applies to the emission of VOM into the atmosphere from Greif's fiber drum manufacturing facility located at 5 S 220 Frontenac Road in Naperville, DuPage County, Illinois (the Facility). 2. The Facility will reduce VOM emissions from its QC Test Process by using a test fluid composed of no more than 45 percent denatured alcohol by weight and no less than 55 percent water by weight. 3. The Facility will calibrate the QC Test Process equipment to spray no more than an average of no more than 48 grams of QC test fluid per drum with compliance to be measured at least once per calendar quarter by the following procedure. a. Weigh a plastic bag on a gram scale to determine the weight of the bag. b. Place the plastic bag over the spray head of the wand of the QC Test Process and secure it in place with a rubber band or binder clip. c. Cycle the QC Test Process by passing a drum through the process in the normal manner of operation with the plastic bag capturing the QC test fluid. Remove the plastic bag from the spray head of the wand of the QC Test Process and weigh it on the same gram scale used in step a. d. Calculate the weight of QC test fluid sprayed as the difference between the weight determined in step c and the weight determined in step a. e. Repeat steps a. through d. for five cycles of the QC Test Process. Calculate the average weight of QC test fluid sprayed per cycle and compare that average to the standard of an average of no more than 48 grams of QC test fluid per drum. 4. All records and logs required by this adjusted standard shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Agency or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Agency or USEPA request for records during the course of a source inspection. 5. The Facility will maintain records of its denatured alcohol usage that will allow the monthly calculation of the amount of denatured alcohol used during the month and the calculation of VOM emissions on a 12-month rolling total basis for comparison to annual VOM limits in the FESOP. To allow these calculations, the Facility will: a. Record the volume of denatured alcohol held as inventory on the first and last day of each month. b. Maintain records of the volume of denatured alcohol received at the Facility during each month. c. The volume of denatured alcohol used for a month shall equal the inventory volume on the first day of the month plus the volume received at the Facility during the month, less the volume in inventory on the last day of the month. d. The volume used during a month calculated in step c shall be multiplied by the VOM content of the denatured alcohol (in pounds per unit of volume) to compute the weight (in pounds) of VOM emitted during the month. e. Using the emissions of VOM in pounds calculated for each month in step d, the Facility will compute the 12-month rolling VOM emissions for the QC Test Process and report those results to Facility management. 6. Greif will continue to investigate the availability of alternative QC test fluids with lower VOM content. Greif will incorporate such lower VOM QC test fluids into its QC Test Process provided that the lower VOM QC test fluids allow visual detection of pinholes or other tears or imperfections in the drum linings within an acceptable period of time and does not result in any negative product quality impacts. 7. The proposed adjusted standard will not affect the calculation of Greif's potential Emissions Reduction Market System ("ERMS") baseline or its ERMS allotment if Greif's Naperville plant should participate in the ERMS program. 8. Environmental staff of Greif's parent will conduct a formal training session for Naperville facility personnel on the requirements of the FESOP and the internal procedures for tracking compliance with FESOP conditions. 9. Emissions and operation of the QC Test Process shall not exceed the following limits: (Tons/Mo) (Tons/Yr) VOM Usage 2.3 22.8 VOM Emissions 2.3 22.8 These limits are based on the maximum material usage and the maximum VOM content. Compliance with the annual limit for this QC Test Process shall be determined from a running total of 12 months of data. Greif's Petition justifies adoption of the adjusted standard based on the following: (1) the factors relating to Greif, particularly Greif's ability to reduce VOM emissions by diluting its QC test fluid and reducing the quantity used per drum, and the engineering complexities of constructing capture equipment over an extended conveyor line, are substantially and significantly different from factors relied on by the Board in adopting Section 218.986(a); (2) the costs of complying with Section 218.986(a) exceed those considered by the Board in setting the requirements of that section; (3) the requested standard will not result in adverse health effects; and (4) the requested standard is consistent with federal law. Any person may cause a public hearing to be held in the above-described adjusted standard proceeding by filing a hearing request with the Illinois Pollution Control Board within 21 days after the date of the publication of this notice. The hearing request should clearly indicate the docket number for the adjusted standard proceeding, as found in this notice, and must be mailed to the Clerk of the Board, Illinois Pollution Control Board, 100 W. Randolph Street, Suite 11-500, Chicago, Illinois 60601. Ad 117235 Pub: August 12, 2011

