

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: June 17, 2011

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

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
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PETITION OF GREIF, INC. AND) AS 2011-001
GREIF PACKAGING, LLC)
FOR AN ADJUSTED STANDARD FROM) (Adjusted Standard – Air)
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PROOF OF PETITION NOTICE REQUIREMENTS

Pursuant to 35 Ill. Adm. Code Sections 104.408 and 104.410, on June 10, 2011, petitioners Greif, Inc. and Greif Packaging, LLC ("Greif") published notice of the filing of their 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 May 31, 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 June 10, 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 June 10, 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 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: June 17, 2011

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

CERTIFICATE OF SERVICE

I, the undersigned, certify that on this 17th day of June, 2011, I have served electronically the attached NOTICE OF ELECTRONIC FILING and PROOF OF PETITION NOTICE REQUIREMENTS upon the following person:

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

and by U.S. Mail, first class postage prepaid, to the following persons:

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

/s/ Susan Charles
Susan Charles

ICE MILLER LLP

Greif, Inc. Docket Number 2011-001

ADORDERNUMBER: 0000088046-01

PO NUMBER: Greif, Inc. Docket Numbe

AMOUNT: \$240.00

NO OF AFFIDAVITS: 1

**Sun Times Media
Sun-Times Media West
Certificate of Publication**

State of Illinois - County of DuPage

Sun-Times Media West, 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, EFF. July 17, 1959. Formerly Ill. Rev. Stat. 1991, CH100, Pl.

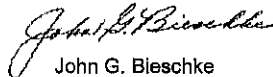
Note: Notice appeared in the following checked positions.

PUBLICATION DATE(S): 06/10/2011

Naperville Sun

IN WITNESS WHEREOF, the undersigned, being duly authorized, has caused this Certificate to be signed and notarized

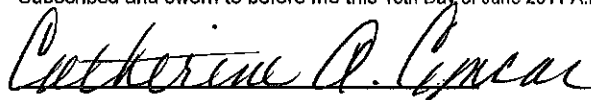
By



John G. Bieschke

Account Manager - Public Legal Notices

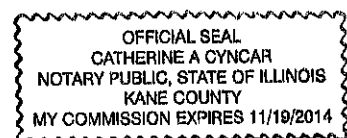
Subscribed and sworn to before me this 10th Day of June 2011 A.D.



Notary Public

ICE MILLER LLP
2300 CABOT DR STE 455
LISLE, IL 60532-4613

Exhibit 1



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

On May 31, 2011, Greif, Inc. and Greif Packaging, LLC (Greif) filed an 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 § 218.996(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 218.996(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 South 220 Frontenac Road in Naperville, DuPage County, Illinois.
 2. Greif will reduce VOM emissions from its QC Test Process by using a test fluid composed of 45 percent denatured alcohol and 55 percent water.
 3. The QC Test Process equipment will be calibrated to spray no more than an average of 48 grams of QC test fluid per drum to be measured as follows: once per quarter Greif will conduct a test to verify that the average amount of QC test fluid sprayed into at least five drums meets this condition.
 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 Illinois Environmental Protection Agency (Agency) or the United States Environmental Protection Agency (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 course 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. Greif 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 Greif's Federally Enforceable State Operating Permit (FESOP).
 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. Greif will coordinate with the Agency to submit to USEPA a request for revision of the Illinois State Implementation Plan consistent with this proposed adjusted standard requiring use of the diluted QC test fluid and limiting the amount of QC test fluid sprayed per drum as an alternative to capture and control technology.
 8. 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.
 9. 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.
 10. Greif will continue to implement an improved system for monthly tracking and calculations of VOM emissions and monthly comparison of the calculations to VOM limits contained in the FESOP. The results of the comparison will continue to be reported to Greif's facility management monthly so that any deviations or exceedances of FESOP conditions can be identified and timely reported to the Agency as required by FESOP condition 6.
- 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 218.996(a); (2) the costs of complying with Section 218.996(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 88046 Pub: June 10, 2011