



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**DATE:** *August 6, 2021*

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
International Paper Company, Rockford, IL

**FROM:** Brittany Cobb, Environmental Engineer  
AECAB (MI/WI)

**THRU:** Sarah Marshall, Section Chief  
AECAB (MI/WI)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** International Paper Company

**Facility Location:** 2100 23rd Av., Rockford, IL, 61104

**Date of Inspection:** 7/12/2021

**EPA Inspector(s):**

1. Brittany Cobb, Environmental Engineer
2. Charles Hall, Environmental Engineer

**Other Attendees:**

1. Daniel Dolehide – International Paper Company
2. Jervon Mitchell – International Paper Company
3. Kevin Hainchek – International Paper Company

**Contact Email Address:** Josh.Strean@ipaper.com

**Purpose of Inspection:** To determine Clean Air Act (CAA) Compliance.

**Facility Type:** Corrugated and solid fiber box plant.

**Regulations Central to Inspection:** 40 CFR 63, Subpart A – National Emission Standards for Hazardous Air Pollutants: General Provisions; 40 CFR 63, Subpart KK – National Emission Standards for Hazardous Air Pollutants: Printing and Publishing Industry

**Arrival Time:** 1:30PM Central Time (CT)

**Departure Time:** 3:00PM CT

**Inspection Type:**

- Unannounced Inspection
- Announced Inspection

**OPENING CONFERENCE**

- Presented Credentials
- Stated authority and purpose of inspection
- Small Business Resource Information Sheet not provided. Reason: Not a small business
- Provided CBI warning to facility

The following information was obtained verbally from Daniel Dolehide, Jervon Mitchell and Kevin Hainchek.

**Process Description:**

International Paper Co. makes boxes for the food industry, including General Mills and Amazon. The majority of raw materials brought into the facility are caustic soda, starch, paper and ink. The ink is water based and received in 5-gallon buckets. Additional miscellaneous materials are brought in, such as water repellent coatings. There are four flexographic printer/folder/gluer line, a corrugator, a cyclone, two rotary die cutters, a starch silo with filter, a natural gas-fired boiler, and two natural gas-fired furnaces. The paper is corrugated, and the caustic soda and starch are mixed and heated. The caustic-starch mixture is used to glue together 2 layers of paper on either side of the corrugated layer to create box sheets. These sheets are then cut, folded, and dyed.

The cyclone collects scrap pieces of corrugated paper cut from the sheets on the flexographic lines. There is a sensor in the cyclone that monitors pressure. If there is a loss in pressure, indicating a loss in suction, the cyclone shuts down. The collection of scraps is solely performed so that the material can be recycled, and the cyclone is not intended to operate as an emission control device.

**Staff Interview:** Ownership has not changed in the past 5 years and there are 113 employees. Emissions are calculated based on quantity input of starch and ink.

**TOUR INFORMATION**

**EPA Tour of the Facility:** Yes

**Data Collected and Observations:**

EPA inspectors went on a tour of the facility with Daniel Dolehide and Jervon Mitchell. Inspectors observed the corrugator, and one out of the four flexographic lines was actively running. There were empty 5-gallon buckets of ink near the lines, that were recently added to the flexographic printers. The flexographic production lines did not have visible vents or hoods for exhausting emissions. The inspectors were also shown the cyclone on the roof, which was actively running. The cyclone collects scraps of cardboard and is not intended for emission control. There were no visible emissions observed on site. The EPA inspectors then reviewed emissions calculations based on facility usage of starch and ink.

**Photos and/or Videos:** were not taken during the inspection.

**Field Measurements:** were not taken during this inspection.

**RECORDS REVIEW**

1. Emissions calculations from 2020 and 2021.

**CLOSING CONFERENCE**

- Provided U.S. EPA point of contact to the facility

**Requested documents:**

1. Annual Emissions Reports for 2017-2020
2. Emission usage entries for 2020 and 2021
3. Summary of emission calculations for 2020 and 2021

**SIGNATURES**

**X** Cobb,  
Brittany

Digitally signed by Cobb,  
Brittany  
Date: 2021.08.06  
08:57:07 -05'00'

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Brittany Cobb  
Environmental Engineer

**X**

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Sarah Marshall  
Section Chief