

FINAL DRAFT/PROPOSED CAAPP PERMIT

OSI

I.D. No.: 031600FJQ

Permit Number: 96020120

October 24, 2000

217/782-2113

**TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>**

PERMITTEE

OSI

Attn.: Dick Statz  
1034 S. Kostner  
Chicago, Illinois 60624

Application No.: 96020120

I.D. No.: 031600FJQ

Applicant's Designation:

Date Received: February 28, 1996

Operation of: Wood Office Furniture Manufacturing Facility

Date Issued: TO BE DETERMINED

Expiration Date<sup>2</sup>: DATE

Source Location: 1034 S. Kostner, Chicago, Cook County, 60624

Responsible Official: Brian Good, General Manager

This permit is hereby granted to the above-designated Permittee to operate a Wood Office Furniture Manufacturing Facility, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Robert Bernoteit at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:RWB:psj

cc: Illinois EPA, FOS, Region 1  
USEPA

<sup>1</sup> This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit.

<sup>2</sup> Except as provided in condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

OSI  
1034 S. Kostner  
Chicago, Illinois 60624  
615/452-9120

I.D. No.: 031600FJQ  
Standard Industrial Classification: 2521, Wood Office Furniture

1.2 Owner/Parent Company

G. F. Office Furniture Holdings Inc.  
525 Steam Plant Rd.  
Gallatin, Tennessee 37066

1.3 Operator

OSI  
1034 S. Kostner  
Chicago, Illinois 60624

Dick Statz  
773/638-3400

1.4 General Source Description

OSI is located at 1034 S. Kostner in Chicago. The source manufactures wooden office furniture such as tables, cabinets, and shelves. OSI's operations are located in two buildings at this location, the North and South. In the South building, woodworking operations are performed. In the North building, assembly and finishing activities are performed.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
ACMA	Alternative Compliance Market Account
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
FIRE	Factor Information Retrieval System, Version 5.0, Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants (EPA-454/R-95-012), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ft <sup>3</sup>	cubic foot
gal	gallon
HAP	Hazardous Air Pollutants
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
l	liter
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
Mft <sup>3</sup>	Million cubic feet
Mg	Metric Tonnes or Megagrams
mmBtu	Million Btus
mo	month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter

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PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SCC	Source Classification Code
SIC	Standard Industrial Classification
SO <sub>2</sub>	Sulfur Dioxide
T	Ton
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
Wt	Weight
yr	year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

None

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

#### 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

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3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

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4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
ES-1	Seven (7) Wood Furniture Coating Spray Booths and ConveyORIZED Infrared Drying Ovens	Prior to 1989	Dry Filters on Each Spray Booth
ES-2	Adhesive Spray Booth	Prior to 1989	Dry Filters
ES-3	Wood Working Operations (Edge Sanders, Table Saws, and Band Saws)	Prior to 1994	Dust Collection System ES-3
ES-4.1	Kewanee Model #AG-15 Natural Gas-Fired Boiler (Boiler #1 North, 15 mmBtu/hr)	1920	None
ES-4.2	Kewanee Model #S14.1-G-75 Natural Gas-Fired Boiler (Boiler #2 North, 12 mmBtu/hr)	1920	None
ES-5	Wood Working Operations (Horizontal Borers, Cutting/Shaping, Sanders, Table Saws, Vertical Borers, Edge Banders, Band Saws, Dove Tail Machs, Molders, Planers, Chop Saws, Gang Rip Saws, Double Miter Saws, Overhead Routers, Stroke Sanders)	Prior to 1991	Dust Collection System ES-5
ES-6.1	Kroeschell Model #f18.7-g-75 Natural Gas-Fired Boiler (Boiler #1 South, 17 mmBtu/hr)	December, 1945	None
ES-6.2	Kroeschell Model #PG-E23V Natural Gas-Fired Boiler (Boiler #2 South, 22.270 mmBtu/hr)	1920	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of PM and VOM emissions.

5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. The emission of smoke or other particulate matter from any emission unit shall not exceed an opacity of greater than 30 percent, except that an opacity of greater than 30 percent but less than 60 percent shall be allowed for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 feet) radius from the center point of any other such emission unit owned or operated by the Permittee, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period, pursuant to 35 IAC 212.123 and 212.124.

5.2.3 Operating Program for Particulate Matter

- a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].
- d. All unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods [35 IAC 212.307].

5.2.4 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an

approved technician certification program pursuant to 40 CFR 82.161.

5.2.5 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.6 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.7 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow

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alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
  - i. Illinois EPA, Compliance Section; and
  - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
  - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

5.3.1 This permit is issued based on the source not being subject to the emission limits and work practice standards of the NESHAP for Wood Furniture Manufacturing Operations, 40 CFR 63 Subpart JJ, because the source is not a major source of HAP emissions. (See also Condition 5.5.)

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Nitrogen Oxides (NO <sub>x</sub> )	12
Particulate Matter (PM)	200
Sulfur Dioxide (SO <sub>2</sub> )	4
Volatile Organic Material (VOM)	88
HAP, not included in VOM or PM	--
TOTAL	304

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the emission limits and work practice standards of the NESHAP for Wood Furniture Manufacturing Operations, 40 CFR 63 Subpart JJ, do not apply to the source.

5.5.3 Other Source-Wide Emission Limitations

The annual emissions from the source shall not exceed the following limitations:

- a. Annual emissions shall not exceed the amounts specified in the Table below:

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<u>Emission Unit</u>	Annual Emissions (Tons/year)				
	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>NO<sub>x</sub></u>	<u>VOM</u>	<u>CO</u>
4 Boilers and 5 Air Make-up Units	0.33	--	8.72	0.22	2.11

These limits are based on the standard emission factors for natural gas, the maximum firing rates and the maximum hours of operation (2,016 hr/yr for the boilers and 1,920 for the air make-up units).

- b. The limits on VOM are limitations established in Permit 91050067, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. [T1].
- c. The limits on CO, NO<sub>x</sub>, and PM are limitations established in Permit 91050067, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21. [T1].
- d. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

### 5.6.2 General Records for Wood Furniture Manufacturing Operations

Pursuant to 40 CFR 63.800(b), a source that complies with the limits and criteria specified in Conditions 5.6.2(a), (b), (c) (see also 40 CFR 63.800(b)(1), (b)(2), or (b)(3)) is an area source for the purposes of 40 CFR 63 Subpart JJ and is not subject to any other provision of this rule, provided that: In the case of Conditions 5.6.2(a) and (b) (see also 40 CFR 63.800(b)(1) and (b)(2)), finishing materials, adhesives, cleaning solvents and washoff solvents used for wood furniture or wood furniture component manufacturing operations account for at least 90 percent of annual HAP emissions at the plant site, and if the plant site has HAP emissions that do not originate from the listed materials, the owner or operator shall keep any records necessary to demonstrate that the 90 percent criterion is being met. A source that initially relies on the limits and criteria specified in Conditions 5.6.2(a), (b), and (c) (see also 40 CFR 63.800(b)(1), (b)(2), and (b)(3)) to become an area source, but subsequently exceeds the relevant limit (without first obtaining and complying with other limits that keep its potential to emit hazardous air pollutants below major source levels), becomes a major source and must comply thereafter with all applicable provisions of 40 CFR 63 Subpart JJ starting on the applicable compliance date in 40 CFR 63.800. Nothing in this Condition (see also 40 CFR 63.800(b)) is intended to preclude a source from limiting its potential to emit through other appropriate mechanisms that may be available through the permitting authority.

- a. The owner or operator of the source uses no more than 250 gallons per month, for every month, of coating, gluing, cleaning, and washoff materials at the source, including materials used for source categories other than wood furniture (surface coating), but excluding materials used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining motor vehicles operated by the facility, or the use of toxic chemicals contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). The owner or operator shall maintain records of the total gallons of coating, gluing, cleaning, and washoff materials used each month, and upon request submit such records to the Illinois EPA or USEPA. These

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records shall be maintained for five years [40 CFR 63.800(b)(1)].

- b. The owner or operator of the source uses no more than 3,000 gallons per rolling 12-month period, for every 12-month period, of coating, gluing, cleaning, and washoff materials at the source, including materials used for source categories other than wood furniture (surface coating), but excluding materials used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining motor vehicles operated by the facility, or the use of toxic chemicals contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). A rolling 12-month period includes the previous 12 months of operation. The owner or operator of the source shall maintain records of the total gallons of coating, gluing, cleaning, and washoff materials used each month and the total gallons used each previous month, and upon request submit such records to the Illinois EPA or USEPA. Because records are needed over the previous set of 12 months, the owner or operator shall keep monthly records beginning no less than one year before the compliance date specified in 40 CFR 63.800(e). Records shall be maintained for five years [40 CFR 63.800(b)(2)].
- c. The source emits no more than 4.5 Mg (5 tons) of any one HAP per rolling 12-month period and no more than 11.4 Mg (12.5 tons) of any combination of HAP per rolling 12-month period, and at least 90 percent of the plantwide emissions per rolling 12-month period are associated with the manufacture of wood furniture or wood furniture components. The owner or operator shall maintain records that demonstrate that annual emissions do not exceed these levels, including monthly usage records for all finishing, gluing, cleaning, and washoff materials; certified product data sheets for these materials; and any other records necessary to document emissions from source categories other than wood furniture and upon request submit such records to the Illinois EPA or USEPA. These records shall be maintained for five years [40 CFR 63.800(b)(3)].

5.6.3 Records for HAP Emissions

The Permittee shall maintain records of the following items for the source to verify that the source is not a major source of HAP emissions and therefore not subject to the emission limits and work practice standards of 40 CFR Part 63, Subpart JJ, and to quantify annual HAP emissions, so as to demonstrate compliance with the annual emission limits in Condition 5.5:

- a. Records of all required measurements and calculations needed to demonstrate the source uses:
  - i. less than 9.1 Mg (10 tons) per each rolling 12 month period of each HAP at the source, including materials used for source categories or purposes other than wood furniture manufacturing operations; and
  - ii. less than 22.7 Mg (25 tons) per each rolling 12 month period of any combination of HAP at the source including materials used for source categories of purposes other than wood furniture manufacturing operations.
- b. Records maintained on a monthly basis for the previous month:
  - i. The mass of all HAP containing materials used on a monthly basis; and
  - ii. The mass fraction of HAP present in each HAP containing material used on a monthly basis.

5.6.4 Records for Natural Gas Usage

The Permittee shall maintain records of the following items for the units which combust natural gas so as to demonstrate compliance with Conditions 5.5.1 and 5.5.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Natural gas usage of the source, Mft<sup>3</sup>/mo and Mft<sup>3</sup>/yr; and
- b. Records of the monthly and aggregate annual CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, and VOM emissions from the combustion of natural gas at the source shall be maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

5.6.5 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

- a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year, (e.g., for the

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month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and

- b. The total annual emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year, (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

5.7.4 Reporting of Exceedance of Source-Wide Emission Limitation

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected boiler with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions of CO, NO<sub>x</sub>, PM, and/or VOM in excess of the limits specified in Condition 5.5.3(a) based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Fuel Combustion Emissions

To determine compliance with Conditions 5.5.1 and 5.5.3(a), emissions from the combustion of natural gas at the source shall be calculated based on the following emission factors:

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<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/Mft<sup>3</sup>)</u>
CO	84
NO <sub>x</sub>	100
PM	7.6
SO <sub>2</sub>	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Fifth Edition, Supplement D, March, 1998.

Natural Gas Fuel Combustion Emissions (lb) = (Natural Gas Consumed, Mft<sup>3</sup>) x (The Appropriate Emission Factor, lb/Mft<sup>3</sup>)

## 6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

### 6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

## 6.2 Applicability

This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

## 6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
  - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
  - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
  - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

## 6.4 Federal Enforceability

Section 6.0 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Units ES-4, ES-6 Boilers

7.1.1 Description

Two natural gas-fired boilers are used to produce hot water and steam to provide heat to each of the source's two buildings (two in each building, total of four boilers). Boiler #1 South is located in the source's south building and was originally constructed in 1945. The remaining three boilers were constructed in 1920.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
ES-4.1	Kewanee Model #AG-15 Natural Gas-Fired Boiler (Boiler #1 North, 15 mmBtu/hr)	None
ES-4.2	Kewanee Model #S14.1-G-75 Natural Gas-Fired Boiler (Boiler #2 North, 12 mmBtu/hr)	None
ES-6.1	Kroeschell Model #f18.7-g-75 Natural Gas-Fired Boiler (Boiler #1 South, 17 mmBtu/hr)	None
ES-6.2	Kroeschell Model #PG-E23V Natural Gas-Fired Boiler (Boiler #2 South, 22.270 mmBtu/hr)	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. Boilers #1 North, #2 North, #1 South, and #2 South are is an "affected boilers" for the purpose of these unit-specific conditions.
- b. Each affected boiler is subject to the emission limits identified in Condition 5.2.2.
- c. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.1.4 Non-Applicability of Regulations of Concern

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- a. The affected boilers are not subject to the NSPS for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subparts A and Dc, because construction, modification, or reconstruction of each affected boiler commenced prior to June 9, 1989.
- b. The affected boilers are not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides from Existing Fuel Combustion Emission Sources in Major Metropolitan Areas, because the actual heat input of each affected boiler is less than 73.2 MW (250 mmBtu/hr).
- c. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use Of Organic Material.

7.1.5 Operational And Production Limits And Work Practices

The affected boilers shall only be operated with natural gas as the fuel.

7.1.6 Emission Limitations

There are no specific emission limitations for these units, however, there are source wide emission limitations in Condition 5.5 that include these units.

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Conditions 5.5.1 and 7.1.3, pursuant to Section 39.5(7)(b) of the Act:

None

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected boiler with the permit requirements as follows, pursuant to Section 39.5(7)(f)(iii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

None

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

Compliance with Conditions 7.1.3(b) and (c) is assumed by the work-practices inherent in operation of a natural gas-fired boiler, so that no compliance procedures are set in this permit addressing this regulation.

7.2 Units ES-3 & ES-5 Wood Working Operations  
Control ES-3 & ES-5 Dust Collecting Systems

7.2.1 Description

The wood working operations include cutting using various types of saws, boring, profiling, and sanding. Emissions of particulate matter (sawdust) are controlled by two dust collection systems.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
ES-3	Wood Working Operations (Edge Sanders, Table Saws, and Band Saws)	Dust Collection System ES-3
ES-5	Wood Working Operations (Horizontal Borers, Cutting/Shaping, Sanders, Table Saws, Vertical Borers, Edge Banders, Band Saws, Dove Tail Machs, Molders, Planers, Chop Saws, Gang Rip Saws, Double Miter Saws, Overhead Routers, Stroke Sanders)	Dust Collection System ES-5

7.2.3 Applicability Provisions and Applicable Regulations

- a. The wood working operations listed in Condition 7.2.2 are "affected wood working operations" for the purpose of these unit-specific conditions.
- b. Each affected wood working operation is subject to the emission limits identified in Condition 5.2.2.

7.2.4 Non-Applicability of Regulations of Concern

- a. Pursuant to 35 IAC 212.681(b), 35 IAC 212.321, Particulate Matter from Process Emission Units, shall not apply to woodworking.
- b. The affected wood working operations are not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM<sub>10</sub>, as identified in 35 IAC 212.324(a)(1).

7.2.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for each dust collection system, including periodic inspection, routine maintenance and prompt repair of defects.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected wood working operations are subject to the following:

- a. Emissions of particulate matter from the woodworking operations shall not exceed 6.6 tons/year. This limit is based on the maximum emission rate and year round operation (8,760 hours/year). The annual limit is the product of the hourly limit and the maximum hours of operation.
- b. The above limitations were established in Permit 89120016, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].
- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected wood working operation to demonstrate

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compliance with Conditions 5.5.1 and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Records addressing use of good operating practices for the dust collection systems:
  - i. Records for periodic inspection of each dust collection system with date, individual performing the inspection, and nature of inspection; and
  - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- b. The amount of wood waste recovered by the dust collection systems, ton/mo and ton/yr; and
- c. The monthly and aggregate annual PM emissions from the affected wood working operations based on the wood waste recovered by the dust collection systems and standard emission factors, with supporting calculations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected wood working operation with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Continued operation of an affected wood working operation with a defect in the dust collection system that may result in emissions of particulate matter in excess of limits in Condition 7.2.6 within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

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To determine compliance with Conditions 5.5.1 and 7.2.6, PM emissions from the affected wood working operations shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/ton)</u>
PM	1.0

This is the emission factor for miscellaneous wood working operations wood waste storage bin vent (SCC #30703001), FIRE Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants, August, 1995.

$$\text{PM Emissions (lb)} = (\text{Wt of Wood Waste Recovered by Dust Collection System, Ton}) \times (\text{The Appropriate Emission Factor, lb/Ton}) \times [1 - (\text{Dust Collector Efficiency}^* (\%)/100)]$$

\*As specified by manufacturer or vendor of the dust collection systems.

7.3 Units ES-1 Wood Coating Line  
 Controls ES-1 Dry Filters

7.3.1 Description

The finishing operations include the application of a stain, wash coating, and then a top coating with lacquer and sealer to the assembled furniture. These coatings are applied in eight spray booths with dry filters. The coatings are then dried using conveyORIZED infrared drying ovens.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
ES-1	Seven (7) Wood Furniture Coating Spray Booths and ConveyORIZED Infrared Drying Ovens	Dry Filters on Each Spray Booth

7.3.3 Applicability Provisions and Applicable Regulations

- a. The Wood Furniture Coating Spray Booths and ConveyORIZED Infrared Drying Ovens are an "affected coating line" for the purpose of these unit-specific conditions.
- b. The affected coating line is subject to the emission limits identified in Condition 5.2.2.
- c. The affected coating line is subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- d. Pursuant to 35 IAC 218.204, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission

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limitations for the specified coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 IAC 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in Condition 7.3.7 (see also 35 IAC 218.105(a)) and the recordkeeping and reporting requirements specified in Conditions 7.3.9(c) and 7.3.10(a) (see also 35 IAC 218.211(c)) except where noted.

i. Pursuant to 35 IAC 218.204(1)(2), on and after March 15, 1998, wood furniture sealers and topcoats must comply with one of the limitations specified in Conditions 7.3.3(d)(i)(A) through (E) (see also 35 IAC 218.204(1)(2)(A) through (E)), below:

A. Topcoat [35 IAC 218.204(1)(2)(A)];

kg VOM/kg solids	lb VOM/lb solids
0.8	0.8

B. Pursuant to 35 IAC 218.204(1)(2)(B), sealers and topcoats with the following limits:

I. Non-acid-cured alkyd amino vinyl sealer [35 IAC 218.204(1)(2)(B)(i)];

kg VOM/kg solids	lb VOM/lb solids
1.9	1.9

II. Non-acid-cured alkyd amino conversion varnish [35 IAC 218.204(1)(2)(B)(ii)];

kg VOM/kg solids	lb VOM/lb solids
1.8	1.8

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III. Acid-cured alkyd amino vinyl sealer  
[35 IAC 218.204(1)(2)(B)(iii)];

kg VOM/kg solids	lb VOM/lb solids
2.3	2.3

IV. Acid-cured alkyd amino conversion  
varnish [35 IAC  
218.204(1)(2)(B)(iv)];

kg VOM/kg solids	lb VOM/lb solids
2.0	2.0

C. Meet the provisions of Conditions  
7.3.3(e) and 7.3.12(a) (see also 35 IAC  
218.215) for use of an averaging approach  
[35 IAC 218.204(1)(2)(C)];

D. Achieve a reduction in emissions  
equivalent to the requirements of  
Condition 7.3.3(d)(i)(A) or (B) (see also  
35 IAC 218.204(1)(2)(A) or (B)), as  
calculated using 35 IAC 218.216 [35 IAC  
218.204(1)(2)(D)]; or

E. Use a combination of the methods  
specified in Conditions 7.3.3(d)(i)(A)  
through (D) (see also 35 IAC  
218.204(1)(2)(A) through (D)) [35 IAC  
218.204(1)(2)(E)].

ii. Other wood furniture coating limitations on  
and after March 15, 1998 [35 IAC  
218.204(1)(3)]:

A. Opaque stain [35 IAC 218.204(1)(3)(A)]:

kg/l	lb/gal
0.56	4.7

B. Non-topcoat pigmented coat [35 IAC  
218.204(1)(3)(B)]:

kg/l	lb/gal
0.60	5.0

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C. Repair coat [35 IAC 218.204(1)(3)(C)]:

kg/l	lb/gal
0.67	5.6

D. Semi-transparent stain [35 IAC 218.204(1)(3)(D)]:

kg/l	lb/gal
0.79	6.6

E. Wash coat [35 IAC 218.204(1)(3)(E)]:

kg/l	lb/gal
0.73	6.1

iii. Other wood furniture coating requirements on and after March 15, 1998 [35 IAC 218.204(1)(4)]:

A. No source subject to the limitations of Condition 7.3.3(d)(i) or (ii) (see also 35 IAC 218.204(1)(2) or (3)) and utilizing one or more wood furniture coating spray booths shall use strippable spray booth coatings containing more than 0.8 kg VOM/kg solids (0.8 lb VOM/lb solids), as applied [35 IAC 218.204(1)(4)(A)].

B. Any source subject to the limitations of Condition 7.3.3(d)(i) or (ii) (see also 35 IAC 218.204(1)(2) or (3)) shall comply with the requirements of Conditions 7.3.5(a) through (c) (see also 35 IAC 218.217) [35 IAC 218.204(1)(4)(B)].

e. On and after March 15, 1998, any owner or operator of a source subject to the limitations of Condition 7.3.3(d) (see also 35 IAC 218.204(1)) may elect to comply with the requirements of Condition 7.3.12(a) rather than complying with the applicable emission limitations set forth in Condition 7.3.3(d)(i)(A) or (B) (see also 35 IAC 218.204(1)(2)(A) or (B)). The source must continue to comply with the limitations set forth in Conditions 7.3.3(d)(ii) and (iii) (see also 35 IAC 218.204(1)(3) and (4)). A source electing to rely on Condition 7.3.12(a) to demonstrate compliance with the requirements of 35 IAC 218

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Subpart F shall operate pursuant to federally enforceable permit conditions approved by the Agency and USEPA [35 IAC 218.215(a)].

7.3.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected coating line not being subject to the emission limits and work practice standards of the NESHAP for Wood Furniture Manufacturing Operations, 40 CFR 63 Subpart JJ, because the source is not a major source of HAP emissions. (See also Condition 5.5.)
- b. The affected coating line is not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM<sub>10</sub>, as identified in 35 IAC 212.324(a)(1).
- c. No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204 [35 IAC 218.209].

7.3.5 Operational and Production Limits and Work Practices

- a. Spray booth cleaning. Each owner or operator of a source subject to the limitations of Condition 7.3.3(d) (see also 35 IAC 218.204(1)) shall not use compounds containing more than 8.0 percent, by weight, of VOM for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, and metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent to prepare the booth prior to applying the booth coating [35 IAC 218.217(a)].
- b. Cleaning and storage requirements. Pursuant to 35 IAC 218.217(b), each owner or operator of a source subject to the limitations of Condition 7.3.3(d) (see also 35 IAC 218.204(1)) shall:

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- i. Keep, store, and dispose of all coating, cleaning, and washoff materials in closed containers [35 IAC 218.217(b)(1)];
  - ii. Pump or drain all organic solvent used for line cleaning into closed containers [35 IAC 218.217(b)(2)];
  - iii. Collect all organic solvent used to clean spray guns in closed containers [35 IAC 218.217(b)(3)]; and
  - iv. Control emissions from washoff operations by using closed tanks [35 IAC 218.217(b)(4)].
- c. Application equipment requirements. Pursuant to 35 IAC 218.217(c), no owner or operator of a source subject to the limitations of Condition 7.3.3(d) (see also 35 IAC 218.204(1)) shall use conventional air spray guns to apply coating materials to wood furniture except under the circumstances specified in Conditions 7.3.5(c)(i) through (iv) (see also 35 IAC 218.217(c)(1) through (4)):
- i. To apply coating materials that have a VOM content no greater than 1.0 kg VOM/kg solids (1.0 lb VOM/lb solids), as applied [35 IAC 218.217(c)(1)];
  - ii. Pursuant 35 IAC 218.217(c)(2), for repair coating under the following circumstances:
    - A. The coating materials are applied after the completion of the coating operation [35 IAC 218.217(c)(2)(A)]; or
    - B. The coating materials are applied after the stain and before any other type of coating material is applied, and the coating materials are applied from a container that has a volume of no more than 2.0 gallons [35 IAC 218.217(c)(2)(B)];
  - iii. If the spray gun is aimed and triggered automatically, rather than manually [35 IAC 218.217(c)(3)]; or

iv. If emissions from the finishing application station are directed to a control device pursuant to 35 IAC 218.216 [35 IAC 218.217(c)(3)].

d. The Permittee shall follow good operating practices for the dry filters, including periodic inspection, routine maintenance and prompt repair of defects.

#### 7.3.6 Emission Limitations

There are no specific emission limitations for these units, however, there are source wide emission limitations in Condition 5.5 that include these units.

#### 7.3.7 Testing Requirements

a. The VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 to establish the records required under Condition 7.3.9(c) (see also 35 IAC 218.211) [35 IAC 218.211(a)].

b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined as follows:

i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.3.9(c) directly reflect the application of such material and separately account for any additions of solvent.

#### 7.3.8 Monitoring Requirements

Any source subject to the limitations of Condition 7.3.3(d)(i)(A) or (B) (see also 35 IAC 218.204(1)(2)(A) or (B)) and utilizing one or more continuous coaters shall, for each continuous coater, use an initial coating which

complies with the limitations of Condition 7.3.3(d)(i)(A) or (B) (see also 35 IAC 218.204(1)(2)(A) or (B)). The viscosity of the coating in each reservoir shall always be greater than or equal to the viscosity of the initial coating in the reservoir. The owner or operator shall monitor the viscosity of the coating in the reservoir with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added [35 IAC 218.204(1)(4)(C)(i)].

#### 7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected coating line to demonstrate compliance with Conditions 5.5.1, 7.3.3, and 7.3.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.3.7, which include the following [Section 39.5(7)(e) of the Act]:
  - i. Identification of material tested;
  - ii. Results of analysis;
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.
- b. Pursuant to 35 IAC 218.204(1)(4)(C), any source subject to the limitations of Condition 7.3.3(d)(i)(A) or (B) (see also 35 IAC 218.204(1)(2)(A) or (B)) and utilizing one or more continuous coaters shall, for each continuous coater, use an initial coating which complies with the limitations of Condition 7.3.3(d)(i)(A) or (B) (see also 35 IAC 218.204(1)(2)(A) or (B)). The viscosity of the coating in each reservoir shall always be greater than or equal to the viscosity of the initial coating in the reservoir. The owner or operator shall
  - i. Collect and record the reservoir viscosity and the amount and weight of VOM per weight of solids of coating and solvent each time coating or solvent is added [35 IAC 218.204(1)(4)(C)(ii)]; and

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- ii. Maintain these records at the source for a period of three years [35 IAC 218.204(1)(4)(C)(iii)].
- c. Pursuant to 35 IAC 218.211(c)(2), any owner or operator of a coating line subject to the limitations of Condition 7.3.3(d) (see also 35 IAC 218.204) and complying by means of Condition 7.3.3(d) (see also 35 IAC 218.204) shall collect and record all of the following information each day for the affected coating line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating as applied on each coating line [35 IAC 218.211(c)(2)(A)]; and
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line [35 IAC 218.211(c)(2)(B)].
  - iii. On and after March 15, 1998, for coating lines subject to the limitations of Condition 7.3.3(d)(i)(A) or (B) (see also 35 IAC 218.204(1)(2)(A) or (B)), the weight of VOM per weight of solids in each coating as applied each day on each coating line and certified product data sheets for each coating [35 IAC 218.211(c)(2)(C)]; and
  - iv. On and after March 15, 1998, for wood furniture coating spray booths subject to the limitations of Condition 7.3.3(d)(iii)(A) (see also 35 IAC 218.204(1)(4)(A)), the weight of VOM per weight of solids in each strippable spray booth coating as applied each day on each spray booth and certified product data sheets for each coating [35 IAC 218.211(c)(2)(D)].
- d. Pursuant to 35 IAC 218.215(c), an owner or operator of a source electing to rely on Conditions 7.3.3(e) and 7.3.12(a) to demonstrate compliance with 35 IAC 218 Subpart F shall provide to the Illinois EPA:

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- i. The name and identification number of each participating coating line [35 IAC 218.215(c)(1)];
  - ii. The name and identification number of each coating as applied on each participating coating line [35 IAC 218.215(c)(2)];
  - iii. A summary of how averaging will be used to meet the emission limitations [35 IAC 218.215(c)(3)];
  - iv. Documentation that  $V_a \leq V_p$ , as calculated in Condition 7.3.12(a)(i) or (ii) (see also 35 IAC 218.215(b)(1) or (2)) [35 IAC 218.215(c)(4)];
  - v. A description of which types of coating materials will be included in the source's averaging program, which may include stains, basecoats, washcoats, sealers, and topcoats. Coating materials that are applied using continuous coaters may be used in an averaging program only if the source can determine the amount of coating used each day [35 IAC 218.215(c)(5)];
  - vi. A description of methods and procedures for quantifying emissions on a daily basis, including methods to determine the VOM content of each coating and the daily usage of each coating [35 IAC 218.215(c)(6)]; and
  - vii. A summary of the monitoring, recordkeeping, and reporting procedures that will be used to demonstrate daily compliance with the inequalities in Conditions 7.3.12(a)(i) and (ii) (see also 35 IAC 218.215(b)(1) and (2)). These procedures shall be structured such that the Illinois EPA and the owner or operator of the source can determine the source's compliance status for any given day [35 IAC 218.215(c)(7)].
- e. Pursuant to 35 IAC 218.215(d), on and after March 15, 1998, or on and after the initial start-up date, the owner or operator of a source electing to rely on Condition 7.3.12(a) to comply with the requirements of 35 IAC 218 Subpart F shall, for each coating line

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relying on Condition 7.3.12(a), collect and record the following information on a daily basis and maintain the information at the source for a period of three years:

- i. The name and identification number of each coating as applied on the coating line [35 IAC 218.215(d)(1)];
  - ii. The weight of VOM per weight of solids (kg VOM/kg solids) and the weight of solids (kg) of each coating as applied on each coating line on a daily basis [35 IAC 218.215(d)(2)];
  - iii. Certified product data sheets for each coating [35 IAC 218.215(d)(3)]; and
  - iv. The calculations showing the source has met the conditions of the inequalities in Condition 7.3.12(a)(i) or (ii) (see also 35 IAC 218.215(b)(1) or (2)) [35 IAC 218.215(d)(4)].
- f. Records addressing use of good operating practices for the dry filters:
- i. Records for periodic inspection of the dry filters with date, individual performing the inspection, and nature of inspection; and
  - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- g. Coating usage of the affected coating line, gal/day and gal/yr;
- h. VOM content of coatings, % by Wt;
- i. Density of coatings, lb/gal;
- j. Cleanup solvent usage, gal/day and gal/yr;
- k. Density of solvent, lb/gal; and
- l. The operating schedule of the affected coating line; and

- m. The aggregate monthly and annual PM and VOM emissions from the affected coating line based on the coating and solvent usage, the VOM content of such materials, the operating schedule and the typical hourly emission rate, with supporting calculations.

#### 7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected coating line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Pursuant to 35 IAC 218.211(c)(1), any owner or operator of a coating line subject to the limitations of Condition 7.3.3(d) (see also 35 IAC 218.204) and complying by means of Condition 7.3.3(d) (see also 35 IAC 218.204) shall comply with the following:
  - i. Pursuant to 35 IAC 218.211(c)(1), upon changing the method of compliance from an existing subject coating line from Conditions 7.3.3(e) and 7.3.12(a) (see also 35 IAC 218.215) or 35 IAC 218.216 to Condition 7.3.3(d) (see also 35 IAC 218.204); the owner or operator of a subject coating line shall certify to the Illinois EPA that the coating line will be in compliance with Condition 7.3.3(d) (see also 35 IAC 218.204) on and after a date consistent with 35 IAC 218.106. Such certification shall include:
    - A. The name and identification number of each coating as applied on each coating line [35 IAC 218.211(c)(1)(A)];
    - B. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line [35 IAC 218.211(c)(1)(B)]; and
    - C. On and after March 15, 1998, for coating lines subject to the limitations of Condition 7.3.3(d)(i)(A) or (B) (see also 35 IAC 218.204(1)(2)(A) or (B)), the

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weight of VOM per weight of solids in each coating as applied each day on each coating line.

- ii. On and after a date consistent with 35 IAC 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA of any record showing violation of Condition 7.3.3(d) (see also 35 IAC 218.204) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.211(c)(3)(A)].
- b. Pursuant to 35 IAC 218.215(c), an owner or operator of a source electing to rely on Conditions 7.3.3(e) and 7.3.12(a) to demonstrate compliance with 35 IAC 218 Subpart F shall provide to the Illinois EPA:
  - i. The name and identification number of each participating coating line [35 IAC 218.215(c)(1)];
  - ii. The name and identification number of each coating as applied on each participating coating line [35 IAC 218.215(c)(2)];
  - iii. A summary of how averaging will be used to meet the emission limitations [35 IAC 218.215(c)(3)];
  - iv. Documentation that  $V_a \leq V_p$ , as calculated in Condition 7.3.12(a)(i) or (ii) (see also 35 IAC 218.215(b)(1) or (2)) [35 IAC 218.215(c)(4)];
  - iv. Documentation that  $V_a \leq V_p$ , as calculated in Condition 7.3.12(a)(i) or (ii) (see also 35 IAC 218.215(b)(1) or (2)) [35 IAC 218.215(c)(4)];
  - vi. A description of methods and procedures for quantifying emissions on a daily basis, including methods to determine the VOM content of each coating and the daily usage of each coating [35 IAC 218.215(c)(6)]; and
  - vi. A description of methods and procedures for quantifying emissions on a daily basis,

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including methods to determine the VOM content of each coating and the daily usage of each coating [35 IAC 218.215(c)(6)]; and

- c. Pursuant to 35 IAC 218.215(e), on and after March 15, 1998, or on and after the initial start-up date, the owner or operator of a source electing to rely on Condition 7.3.12(a) to comply with the requirements of 35 IAC 218 Subpart F shall:
  - i. Notify the Illinois EPA within 30 calendar days following an occurrence of a violation of Conditions 7.3.3(e) and 7.3.12(a) [35 IAC 218.215(e)(1)]; and
  - ii. Send to the Illinois EPA any record showing a violation of Conditions 7.3.3(e) and 7.3.12(a) within 30 calendar days following the occurrence of a violation [35 IAC 218.215(e)(2)].
- d. Pursuant to 35 IAC 218.215(f), at least 30 calendar days before changing the method of compliance with 35 IAC 218 Subpart F from reliance on Conditions 7.3.3(e) and 7.3.12(a) to reliance on Condition 7.3.3(d)(ii)(A) or (B) (see also 35 IAC 218.204(l)(2)(A) or (B)), the owner or operator of a source relying on Condition 7.3.12(a) to demonstrate compliance with 35 IAC 218 Subpart F for one or more wood furniture coating lines shall:
  - i. Comply with all requirements of Condition 7.3.10(a) (see also 35 IAC 218.211(c)(1)) [35 IAC 218.215(f)(1)]; and
  - ii. Certify that all remaining coating lines relying on Conditions 7.3.3(e) and 7.3.12(a) to comply with the requirements of 35 IAC 218 Subpart F, if any, comply and continue to comply with the requirements of Conditions 7.3.3(e) and 7.3.12(a) [35 IAC 218.215(f)(2)].
- e. Continued operation of the affected coating line with a defect in a dry filter that may result in emissions of particulate matter in excess of limits in Conditions 7.3.3(b) or (c) within 30 days of such an occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

- a. Pursuant to 35 IAC 218.215(b), an owner or operator of a source subject to the limitations of Condition 7.3.3(d) (see also 35 IAC 218.204(1)) and electing to rely on this Condition to demonstrate compliance with 35 IAC 218 Subpart F must establish, by use of Condition 7.3.12(a)(i) or (a)(ii) (see also 35 IAC 218.215(b)(1) or (b)(2)), that, on a daily basis, actual emissions from the affected source are less than or equal to ninety percent of the allowable emissions, that is  $V_a \leq V_p$ :

- i. Option I [35 IAC 218.215(b)(1)]:

$$V_a = \sum_{i=1}^n (ER_{TC_i} \times TC_i)$$

[35 IAC 218.215(b)(1)(A)]; and

$$V_p = 0.9 \times \sum_{i=1}^n (0.8 \times TC_i)$$

[35 IAC 218.215(b)(1)(B)]

- ii. Option II [35 IAC 218.215(b)(2)]:

$$V_a = \sum_{i=1}^n \left[ (ER_{TC_i} \times TC_i) + (ER_{SE_i} \times SE_i) + (ER_{WC_i} \times WC_i) \right. \\ \left. + (ER_{PC_i} \times PC_i) + (ER_{ST_i} \times ST_i) \right]$$

[35 IAC 218.215(b)(2)(A)]; and

$$V_p = 0.9 \times \sum_{i=1}^n \left[ (1.8 \times TC_i) + (1.9 \times SE_i) + (9.0 \times WC_i) + (1.2 \times PC_i) + (0.791 \times ST_i) \right]$$

[35 IAC 218.215(b)(2)(B)]

Where:

- $V_a$  = Actual VOM emissions from the source;
- $V_p$  = 90% of the allowable VOM emissions from the source;
- $n$  = Number of different wood furniture coatings as applied each day on each coating line;
- $i$  = Subscript denoting an individual coating;
- $TC_i$  = kilograms of solids in topcoat "i" used;
- $SE_i$  = kilograms of solids in sealer "i" used;
- $WC_i$  = kilograms of solids in wash coat "i" used;
- $PC_i$  = kilograms of solids in non-topcoat pigmented coat "i" used;
- $ST_i$  = liters of stain "i" used;
- $ER_{TCi}$  = VOM content of topcoat "i" in kg VOM/kg solids, as applied;
- $ER_{SEi}$  = VOM content of sealer "i" in kg VOM/kg solids, as applied;
- $ER_{Wci}$  = VOM content of washcoat "i" in kg VOM/kg solids, as applied;
- $ER_{Pci}$  = VOM content of non-topcoat pigmented coat "i" in kg VOM/kg solids, as applied;
- $ER_{STi}$  = VOM content of stain "i" in kg VOM/liter (kg/l), as applied;

- b. Compliance with Condition 7.3.3(c) is assumed by proper operation of the dry filters, as addressed by Conditions 7.3.5(d) and 7.3.9(f).

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c. To determine compliance with Condition 5.5.1, PM and VOM emissions from the affected coating lines shall be calculated based on the following:

i. Volatile Organic Material Emissions:

$$\text{VOM (lb)} = [(\text{Coating Usage, gal}) \times (\text{Coating Density, lb/gal}) \times (\text{VOM Content of Coating, \% by Wt.})] + [(\text{Cleaning Solvent Usage, gal}) \times (\text{Solvent Density, lb/gal})]$$

ii. Particulate Matter Emissions:

$$\text{PM (lb)} = (\text{Wt of Coating Used, lb}) \times (\text{Wt \% Solids}) \times [1 - (\text{Transfer Efficiency}^* (\%)/100)] \times [1 - (\text{Dry Filter Efficiency}^* (\%)/100)]$$

\*As specified by manufacturer or vendor of the spray booths and dry filters

7.4 Unit ES-2 Adhesive Spray Booth  
Control ES-2 Dry Filters

7.4.1 Description

This spray booth is used to apply an adhesive to attach fabric to fiberglass office panels.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
ES-2	Adhesive Spray Booth	Dry Filters

7.4.3 Applicability Provisions and Applicable Regulations

- a. The Adhesive Spray Booth is an "affected gluing line" for the purpose of these unit-specific conditions.
- b. The affected gluing line is subject to the emission limits identified in Condition 5.2.2.
- c. The affected gluing line is subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.4.4 Non-Applicability of Regulations of Concern

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This permit is issued based on the affected gluing line not being subject to 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, because the affected gluing line does not meet the applicability of 35 IAC 218.920(a) and (b). In particular, the source:

- a. Contains process emissions units not regulated by 35 IAC 218 Subpart F (excluding 35 IAC 218.204(1)) which as a group have maximum theoretical emission of less than 90.7 Mg (100 tons) per calendar year of VOM; and
- b. Has the potential to emit of less than 22.7 Mg (25 tons) per year of VOM, in aggregate, from emission units that are not regulated by 35 IAC 218 Subpart F.

7.4.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the dry filters, including periodic inspection, routine maintenance and prompt repair of defects.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected gluing line is subject to the following:

- a. Emissions from the affected gluing line shall not exceed 24.9 tons/year.
- b. The above limitations are being established in this permit. These limits ensure that the affected gluing line is not subject to the control requirements of 35 IAC Part 218, Subpart PP, Miscellaneous Fabricated Product Manufacturing Processes.
- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.4.7 Testing Requirements

Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the VOM content of specific coatings and cleaning solvents used on the affected gluing line shall be determined as follows:

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- a. The VOM content of representative coatings "as applied" on the affected gluing line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
- b. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.4.9(b) directly reflect the application of such material and separately account for any additions of solvent.

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected gluing line to demonstrate compliance with Conditions 5.5.1 and 7.4.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.4.7, which include the following [Section 39.5(7)(e) of the Act]:
  - i. Identification of material tested;
  - ii. Results of analysis;
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.
- b. Records addressing use of good operating practices for the dry filters:
  - i. Records for periodic inspection of the dry filters with date, individual performing the inspection, and nature of inspection; and
  - ii. Records for prompt repair of defects, with identification and description of defect,

effect on emissions, date identified, date repaired, and nature of repair.

- c. Glue usage, gal/mo and gal/yr;
- d. The VOM content of the glue, % by Wt;
- e. Density of the glue; , lb/gal;
- f. Cleanup solvent usage, gal/mo and gal/yr;
- g. Density of solvent, lb/gal;
- h. The operating schedule of the affected gluing line; and
- i. The monthly and aggregate annual PM and VOM emissions from the affected gluing line based on the operating schedule and the typical hourly emission rate, with supporting calculations.

#### 7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected gluing line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that this emission unit is exempt from those requirements [35 IAC 218.990].
- b. Emissions of VOM from the affected gluing operation in excess of the limits specified in Condition 7.4.3(d), 7.4.4, and/or 7.4.6 within 30 days of such an occurrence.

#### 7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

To determine compliance with Condition 5.5.1, PM and VOM emissions from the affected gluing line shall be calculated based on the following:

a. Volatile Organic Material Emissions:

$$\text{VOM (lb)} = [(\text{Glue Usage, gal}) \times (\text{Glue Density, lb/gal}) \times (\text{VOM Content of Glue, \% by Wt.})] + [(\text{Cleaning Solvent Usage, gal}) \times (\text{Solvent Density, lb/gal})]$$

b. Particulate Matter Emissions:

$$\text{PM (lb)} = (\text{Wt of Glue/Coating Used, lb}) \times (\text{Wt \% Solids}) \times [1 - (\text{Transfer Efficiency}^* (\%)/100)] \times [1 - (\text{Dry Filter Efficiency}^* (\%)/100)]$$

\*As specified by manufacturer or vendor of the spray booth and dry filters

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after \_\_\_\_\_ **{insert public notice start date}** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms

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without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

#### 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions,

methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

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- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

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- i. Illinois EPA - Air Compliance Section  
  
Illinois Environmental Protection Agency  
Bureau of Air  
Compliance Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276
- ii. Illinois EPA - Air Regional Field Office  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016
- iii. Illinois EPA - Air Permit Section (MC 11)  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section  
P.O. Box 19506  
Springfield, Illinois 62794-9506
- iv. USEPA Region 5 - Air Branch  
  
USEPA (AR - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

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- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or

resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for

continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
  - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
  - ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
  - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Emissions of Particulate Matter from New Process Emission Units

10.1.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

where

P = Process weight rate; and  
 E = Allowable emission rate; and,

- i. Up to process weight rates of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

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- c. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.2 Attachment 2 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature \_\_\_\_\_

Name \_\_\_\_\_

Official Title \_\_\_\_\_

Telephone No. \_\_\_\_\_

Date Signed \_\_\_\_\_

RWB:psj

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

OSI is located at 1034 S. Kostner in Chicago. The source manufactures wooden office furniture such as tables, cabinets, and shelves. OSI's operations are located in two buildings at this location, the North and South. In the South building, woodworking operations are performed. In the North building, assembly and finishing activities are performed.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
ES-1	Seven (7) Wood Furniture Coating Spray Booths and Conveyorized Infrared Drying Ovens	Prior to 1989	Dry Filters on Each Spray Booth
ES-2	Adhesive Spray Booth	Prior to 1989	Dry Filters
ES-3	Wood Working Operations (Edge Sanders, Table Saws, and Band Saws)	Prior to 1994	Dust Collection System ES-3
ES-4.1	Kewanee Model #AG-15 Natural Gas-Fired Boiler (Boiler #1 North, 15 mmBtu/hr)	1920	None
ES-4.2	Kewanee Model #S14.1-G-75 Natural Gas-Fired Boiler (Boiler #2 North, 12 mmBtu/hr)	1920	None
ES-5	Wood Working Operations (Horizontal Borers, Cutting/Shaping, Sanders, Table Saws, Vertical Borers, Edge Banders, Band Saws, Dove Tail Machs, Molders, Planers, Chop Saws, Gang Rip Saws, Double Miter Saws, Overhead Routers, Stroke Sanders)	Prior to 1991	Dust Collection System ES-5

Emission Unit	Description	Date Constructed	Emission Control Equipment
ES-6.1	Kroeschell Model #f18.7-g-75 Natural Gas-Fired Boiler (Boiler #1 South, 17 mmBtu/hr)	December, 1945	None
ES-6.2	Kroeschell Model #PG-E23V Natural Gas-Fired Boiler (Boiler #2 South, 22.270 mmBtu/hr)	1920	None

### III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

#### Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Nitrogen Oxides (NO <sub>x</sub> )	12
Particulate Matter (PM)	200
Sulfur Dioxide (SO <sub>2</sub> )	4
Volatile Organic Material (VOM)	88
HAP, not included in VOM or PM	--
TOTAL	304

### IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

POSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

RWB:psj