

FINAL DRAFT/PROPOSED CAAPP PERMIT  
DCP-LOHJA, Inc.  
I.D. No.: 103806AAF  
Application No.: 95090069  
February 1, 2001

217/782-2113

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

PERMITTEE

DCP-LOHJA Inc.  
Attn: Dick Wells  
1101 Warp Road  
Dixon, Illinois 61021

<u>Application No.:</u> 95090069	<u>I.D. No.:</u> 103806AAF
<u>Applicant's Designation:</u>	<u>Date Received:</u> September 7, 1995
<u>Operation of:</u> Coating Facility Producing Silicone Coated Backing Release Paper	
<u>Date Issued:</u> !TO BE DETERMINED!	<u>Expiration Date</u> <sup>2</sup> : !DATE!
<u>Source Location:</u> 1101 Warp Road, Dixon, Lee County	
<u>Responsible Official:</u> Dick Wells, Environmental Specialist	

This permit is hereby granted to the above-designated Permittee to OPERATE a coating plant producing silicone coated release paper, 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 Tom Kolokythas at 217/782-2113.

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

DES:TK:jar

cc: Illinois EPA, FOS, Region 2  
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 CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this 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

DCP - LOHJA Inc.  
1101 Warp Road  
Dixon, Illinois 61021  
815/284-6655

I.D. No.: 103806AAF  
Standard Industrial Classification: 2672, Coated and Laminated  
Paper

1.2 Owner/Parent Company

DCP - LOHJA Inc.  
7700 Griffin Way  
Willowbrook, Illinois 60521

1.3 Operator

DCP-LOHJA Inc.  
1101 Warp Road  
Dixon, Illinois 61021

Dick Wells - Environmental Specialist  
815/284-6655

1.4 General Source Description

DCP-LOJHA, Inc. is located at 1101 Warp Road in Dixon. The source is a coating plant applying silicon release coating to paper and plastic substrates on four (4) coating lines. Two coating lines operate with non-VOM coatings only. The other two are equipped with afterburners to control organic emissions. In general the source has a total of four coating lines, three natural-gas fired boilers, and six above-ground storage tanks.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant 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 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
°C	Degrees Celcius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EPA	Environmental Protection Agency
ERMS	Emission Reduction Market System
°F	Degrees Fahrenheit
ft	feet
ft <sup>2</sup>	Squared feet
ft <sup>3</sup>	Cubic feet
g	grams
gal	gallon
HAP	Hazardous Air Pollutant
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
kW	kilowatts
l	liter
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
MEK	Methyl Ethyl Ketone
Mft <sup>3</sup>	Mega cubic feet
MW	Megawatts
MSDS	Material Safety Data Sheet

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Mg	Megagrams
mmBtu	Million British thermal units
mo	Month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
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
scf	Standard cubic feet
scm	Standard cubic meters
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
VOC	Volatile Organic Compound
VOM	Volatile Organic Material
wt %	Weight percent
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:

Pacific Boiler  
Peerless Boiler  
Coater Room Air Heater  
Toluene Storage Tank  
MEK Storage Tank  
Xylene Storage Tank

- 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:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Equipment used for the mixing and blending of materials at ambient temperature to make water based adhesives, provided each material mixed or blended contains less than 5% organic solvent by weight [35 IAC 201.210(a)(9)].

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Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

- 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.
- 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
01	Coating Lines No.1 and No.2	1970 & 1965	None
02	Coating Lines No.4 and No.10	1965 & 1987	Thermal Oxidizer (Afterburner)
03	Natural Gas-Fired Combustion Emission Units	1996	None
04	Mixers for Coating Lines No.4 and No.10	1965	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 VOM and HAP emissions.

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. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 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.

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- 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.

#### 5.2.4 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.

- 5.2.5 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.

#### 5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall

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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 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.

5.2.7 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.3 Non-Applicability of Regulations of Concern

None

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
Volatile Organic Material (VOM)	315
Sulfur Dioxide (SO <sub>2</sub> )	---
Particulate Matter (PM)	3.3
Nitrogen Oxides (NO <sub>x</sub> )	27.9
HAP, not included in VOM or PM	---
TOTAL	346.2

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

None

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 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.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and

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compliance procedures in Section 7 (Unit Specific  
Conditions) of this permit.

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6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01: Coating Line 1 (Water-Based Coating Applications)  
 Coating Line 2 (Water-Based and Compliant Coating Applications)  
 Control: None

7.1.1 Description

Coating Lines 1 and 2 shall only use solventless coatings or water-base coatings containing no volatile organic material (VOM). One series of water-based coatings used on Lines 1 and 2 contain a small amount of VOM. Approximately 2% by weight of the VOM is toluene, and 2% by weight is tetrachloroethylene. These solvents are contained in the catalyst and emulsion and are added by the manufacturer.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	Coating Line 1	None
	Coating Line 2	

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line", for the purpose of these unit-specific conditions is a coating applicator to apply a coating to a substrate of various types of paper or film. An oven dries the coating by evaporating the solvent.
- b. The affected coating lines are subject to 35 IAC 212.322(b)(1), 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, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 2) [35 IAC 212.322(a)].

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c. The affected coating lines No.1 and No.2 are subject to the limitation of 35 IAC 215.204(c)(1) for paper coating.

i. No owner or operator of the affected coating line shall cause or allow the emission of volatile organic material to exceed the following limitation on coating materials, excluding water and any compounds which are specifically exempted from the definition of VOM, delivered to the coating applicator:

kg/l	lb/gal
0.35	2.9

ii. 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 composites.

d. Clean-up operations performed on each affected coating line are subject to one of the following limitations of 35 IAC Part 215, Subpart K "Use of Organic Material":

i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except with the following exception: If no odor nuisance exists this limitation shall apply only to photochemically reactive material as defined in 35 IAC 211.4690 [35 IAC 215.301]; or

ii. Emissions of organic material in excess of those permitted by 35 IAC 215.301 are allowable if such emissions are controlled by a flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 215.302(a)].

7.1.4 Non-Applicability of Regulations of Concern

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- a. Each affected coating line is not subject to 35 IAC 215.301 or 215.302, pursuant to 35 IAC 215.209, which excludes affected coating lines from these requirements because of applicability to 35 IAC 215.204 and 215.205. This exemption does not apply to the clean-up operations performed on these lines.
  
- 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-10.

7.1.5 Operational And Production Limits And Work Practices

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

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected coating lines are subject to the following:

- a. Emissions and operation of coating lines No.1 and No.2 shall not exceed the following limits:

<u>Material</u>	<u>Coating Usage</u>		<u>Coating VOC Content VOM Emissions</u>		
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb/Gal)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
Coating Containing Solvent Based Catalyst	5,209	62,500	0.4	2,083.60	12.50

These limits are based on representation of maximum operation and maximum actual emission rates.

- b. The above limitations were established in Permit 74020064, 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 from a running total of 12 months of data.

7.1.7 Testing Requirements

Testing of the VOM content of coatings and other materials shall be performed as follows [35 IAC 215.105(a), 215.208 and Section 39.5(7)(b) of the Act]

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- a. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used 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 215.105(a).

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- i. The VOM content in units of lb/gal of representative coatings "as applied" on the affected coating lines shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 215.105(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 7.1.9 directly reflect the application of such material and separately account for any additions of solvent.

7.1.8 Monitoring Requirements

N/A

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 coating line to demonstrate compliance with Conditions 5.5.1 and Section 7.1 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. 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 the affected coating lines;
- b. The weight of VOM per volume of each cleanup solvent, in units of lb/gal, as applied each day on the affected coating lines;
- c. Density of each applied coating and cleanup solvent, in units, lb/gal;
- d. The VOM content of each coating applied, % by wt.;
- e. The usage of each coating and cleanup solvent, in units of gal/mo and gal/yr;
- f. The amount of sludge generated and solvent reclaimed

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on the affected coating lines in units of gal/mo and gal/yr;

- g. The average density lb/gal and wt. % of VOM in the generated sludge and solvent reclaimed;

- h. Records of the testing of VOM content of each coating and cleaning solvent as tested, pursuant to the conditions of this section, which include the following:
  - i. Identification of material tested;
  - ii. Results of analysis;
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.
- i. Total VOM emissions in ton/mo and ton/yr from the affected coating lines calculated using the compliance procedures from Condition 7.1.12.

#### 7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an 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:

Emissions of VOM from the affected coating lines in excess of the limits specified in Condition 5.5.1 and Condition 7.1.6 based on the current month plus preceding 11 months.

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating line prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings or solvents at this source with various VOM contents provided that the materials are tested in accordance with Condition 7.1.7, unit specific Condition in 7.1.6 and the source wide

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emission limitations in Condition 5.5.1 are not exceeded and the affected coating lines remain in compliance with Condition 7.1.3(c).

7.1.12 Compliance Procedures

- a. Compliance of the affected coating lines No.1 and No.2 with the emission limitations in Condition 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9 and the equations established in Condition 7.1.12(b)(i),(ii), and (iii).
- b. Compliance of all affected coating lines with the source-wide emission limitations in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.1.9 and the following equations:
  - i. Uncontrolled VOM Emissions
    - A. VOM Emissions from Coating Operation  
$$[\text{Actual Coating Usage (gal)} \times \text{Coating Density (lb/gal)} \times \text{VOM Content of the Coating (wt. \%)}]$$
    - B. VOM Emissions from Cleanup Operation  
$$[\text{Actual Cleanup Solvent Usage (gal)} \times \text{Solvent Density (lb/gal)} \times \text{VOM Content of the Cleanup Solvent (wt. \%)}]$$
  - ii. Manifested Waste  
$$\text{Coating Operations Manifested Waste [VOM Containing Waste (gal)} \times \text{Waste Density (lb/gal)} \times \text{VOM Content in Waste (wt. \%)}] + \text{Cleanup Solvent Operations Manifested Waste [VOM Containing Waste (gal)} \times \text{Waste Density (lb/gal)} \times \text{VOM Content in Waste (wt.\%)}].$$
  - iii. Total VOM Emissions  
Uncontrolled Emissions - Manifested Waste
- c. i. Compliance of the affected coating lines with VOM emission limitations in Condition 7.1.3(c) shall be based on the recordkeeping requirements in Condition 7.1.9 and the formulas listed below:

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$$\text{Coating VOM Emissions} = V \times D \times U$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

U = Overall coating usage (gal/mo & gal/yr)

- ii. Emissions from cleaning solvent shall be based on the recordkeeping requirements in Condition 7.1.9 and the formulas listed below:

$$\text{Cleaning Solvent VOM Emissions} = V_1 \times D_1 \times U_1$$

Where:

V<sub>1</sub> = Percent VOM in the cleaning solvent (%)

D<sub>1</sub> = Overall cleaning solvent density (lb/gal)

U<sub>1</sub> = Overall cleaning solvent usage (gal/mo  
and gal/yr)

- iii. Emissions of VOM determined for annual compliance shall be achieved by the following equations:

$$\text{Total VOM Emissions} = \text{Coating Emissions} + \text{Cleaning Solvent Emissions} - \text{VOM Waste}$$

7.2 Unit 02: Coating Line 4 (Water-Based, Compliant, and VOM Containing Coating Applications)  
 Mode 1: November 1 of year to March 31 of next year. Assumes the afterburner is off during solvent-based coating applications  
 Mode 2: April 1 to October 31. Assumes the afterburner is on unless water-based coatings are being used.

Coating Line 10 (Water-Based, Compliant, and VOM Containing Coating Applications)

Control: Thermal Oxidizer (Afterburner)

7.2.1 Description

Coating Lines 4 and 10 shall only operate using solventless or water-base coatings or shall be controlled by natural gas fired afterburners unless compliant coatings are used.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
02	Coating Line 4	Thermal Oxidizer (Mode 1) November 1 - March 31
		Thermal Oxidizer (Mode 2) April 1 to October 31
	Coating Line 10	Thermal Oxidizer

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line", for the purpose of these unit-specific conditions is a coating applicator to apply a coating to a substrate of various types of paper or film. An oven dries the coating by evaporating the solvent.
- b. The affected coating line No.4 is subject to 35 IAC 212.322(b)(1), 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, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification

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commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 2) [35 IAC 212.322(a)].

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- c. The affected coating line No.10 is subject to 35 IAC 212.321(b)(1), 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, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced 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 2) [35 IAC 212.321(a)].

- d. The affected coating lines No.4 and No.10 are subject to the limitation of 35 IAC 215.204(c)(1) for paper coating.

- i. No owner or operator of the affected coating line shall cause or allow the emission of volatile organic material to exceed the following limitation on coating materials, excluding water and any compounds which are specifically exempted from the definition of VOM, delivered to the coating applicator:

kg/l	lb/gal
0.35	2.9

- ii. 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 composites.

- e. When coatings with the VOM content exceeding the limits established in Condition 7.2.3(d) are used, the coating operation shall not begun until the thermal oxidizer (afterburner) is on line and the afterburner shall achieve the following:

- i. 81% reduction in the overall emissions of VOM from the coating line(s) [35 IAC 215.205(b)(1)]; and

- ii. Oxidation to carbon dioxide and water of 90% of the nonmethane VOM (measured at total

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combustible carbon) which enters after the afterburner [35 IAC 215.205(b)(2)].

f. Clean-up operations performed on each affected coating line are subject to one of the following limitations of 35 IAC Part 215, Subpart K "Use of Organic Material":

i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except with the following exception: If no odor nuisance exists this limitation shall apply only to photochemically reactive material as defined in 35 IAC 211.4690 [35 IAC 215.301]; or

ii. Emissions of organic material in excess of those permitted by 35 IAC 215.301 are allowable if such emissions are controlled by a flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 215.302(a)].

7.2.4 Non-Applicability of Regulations of Concern

a. The affected coating lines are not subject to 35 IAC 215.301 or 215.302, pursuant to 35 IAC 215.209, which excludes affected coating lines from these requirements because of applicability to 35 IAC 215.204 and 215.205. This exemption does not apply to the clean-up operations performed on these lines.

b. The affected coating lines 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-10.

7.2.5 Operational And Production Limits And Work Practices

a. Each oven and thermal oxidizer shall only be operated with natural gas as the fuel.

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- b. At times the afterburner is used, the afterburner combustion chamber of the thermal oxidizer shall be preheated to the manufacturer's recommended temperature but not lower than 1400F, before the coating operation is begun, and this temperature shall be maintained during operation of the affected coating line(s).
- c. The Permittee shall follow good operating practices for the thermal oxidizer, including periodic inspection, routine maintenance and repair of defects.
- d. Notwithstanding 35 IAC 215.106, winter shutdown of the thermal oxidizer is not permitted.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected coating line is subject to the following:

- a. Emissions and operation of coating line No.4 shall comply with the following limits:

- i. No control by afterburner (April 1 to October 31)

<u>Coating Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb/Gal)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
12,000	60,000	2.9	17.4	87.0

- ii. Ducted to afterburner (April 1 to October 31)

<u>Coating Usage</u>		<u>Overall Control Efficiency</u>	<u>VOM Emissions</u>	
<u>(Lb/Mo)</u>	<u>(Lb/Yr)</u>	<u>(Minimum %)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
238,000	1,666,000	95	11,900	41.65

- iii. Winter shutdown of afterburner (November 1 to March 31)

<u>Coating Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
<u>(Lb/Mo)</u>	<u>(Lb/Yr)</u>	<u>(Lb/Gal)</u>	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>

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42,000 210,000 2.9 42,000 105.0

iv. The above limitations contain revisions to previously issued Permit 74020064. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the monthly and yearly emissions of VOM have been decreased [T1R].

b. Usage of solvents in coatings applied on Line No.10 and emissions of volatile organic material (VOM) shall not exceed the following limits:

Solvents in Coatings <sup>a</sup>			VOM Emissions <sup>b</sup>		
(lb/hr)	(ton/mo)	(ton/yr)	(lb/hr)	(ton/mo)	(ton/yr)
600	218	2,625	30	10.9	131.3

<sup>a</sup> Hourly rate may be determined by predetermined formula involving coating thickness and area coated.

<sup>b</sup> Based on 95% control by the thermal oxidizer.

i. The thermal oxidizer shall be operated so as to reduce emissions of VOM by 95%.

ii. Use of water-based coatings containing no VOM is not restricted and when used the line is

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not required to be ducted to the thermal oxidizer.

iii. The above limitations were established in Permit 74020064, 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

Testing of the VOM content of coatings and other materials shall be performed as follows [35 IAC 215.105(a), 215.208 and Section 39.5(7)(b) of the Act]

a. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used 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 215.105(a).

i. The VOM content in units of lb/gal 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 215.105(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 7.1.9 directly reflect the application of such material and separately account for any additions of

solvent.

- b. Upon request from the Illinois EPA the Permittee shall conduct tests in accordance with procedure of 35 IAC 215.102 to measure the overall control and performance of the thermal oxidizer controlling the affected coating line. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing.
- c. The percent concentration of solvent in the VOM containing waste from the affected coating line shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Methods 8260.

#### 7.2.8 Monitoring Requirements

The thermal oxidizer shall be equipped with a continuous monitoring device which is installed, calibrated, maintained and operated according to vendor specifications at all times the afterburner is in use. This monitoring equipment (temperature strip chart recorder) shall monitor the combustion chamber temperature of an afterburner.

#### 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 the affected coating line to demonstrate compliance with Conditions 5.5.1 and Section 7.2 of this permit, pursuant to Section 39.5(7)(b) of the Act:

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- a. 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 the affected coating line;
- b. The weight of VOM per volume of each cleanup solvent, in units of lb/gal, as applied each day on the affected coating line;
- c. Density of each applied coating and cleanup solvent, in units lb/gal;
- d. The VOM content of each coating applied, % by wt.;
- e. The usage of each coating and cleanup solvent, in units of gal/mo and gal/yr;
- f. The amount of sludge generated and solvent reclaimed on the affected coating line in units of gal/mo and gal/yr;
- g. The average density lb/gal and Wt. % of VOM in the generated sludge and solvent reclaimed;
- h. Records of the testing of VOM content of the coating and cleaning solvent as tested, pursuant to the conditions of this section, which include the following:
  - i. Identification of material tested;
  - ii. Results of analysis;
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.
- i. The Permittee shall collect and record all the following information each day for the affected coating line:
  - i. Control device monitoring data;
  - ii. A log of operating time for the capture system, control device, monitoring equipment, and the associated coating line;

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- iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed, including dates and duration of any outages.
- j. Total VOM emissions in tons/mo and tons/year from the affected coating line and which are calculated using the compliance procedures from Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an 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:

Emission of VOM from the affected coating line in excess of the limits specified in Condition 5.5.1 and 7.2.6 based on the current month plus preceding 11 months.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating line prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings or solvents at this source with various VOM contents provided that the materials are tested in accordance with Condition 7.2.7, unit specific Condition in 7.2.6 and the source wide emission limitations in Condition 5.5.1 are not exceeded.

7.2.12 Compliance Procedures

- a. Compliance of the affected coating lines No.4 and

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No.10 with the emission limitations in Condition 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9 and equations established in Condition 7.2.12 (b)(i),(ii),(iii), and (iv).

- b. Compliance of the affected coating line with the source-wide emission limitations in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.2.9 and the following equations:

- i. VOM Emissions controlled by the thermal oxidizer

A. Captured Emissions

Emissions from Coating Operation = [Actual Coating Usage (gal) x Coating Density (lb/gal) x VOM Content of the Coating (wt.%) ] x [Capture Efficiency (%) / 100 x Destruction Efficiency (100 - destruction efficiency, %) / 100]

B. Uncaptured Emissions

Emissions from Coating Operation = [Actual Coating Usage (gal) x Coating Density (lb/gal) x VOM Content of the Coating (wt.%) ] x [Uncaptured VOM (100 - capture efficiency, %) / 100]

C. Total Emissions

Captured Emissions + Uncaptured Emissions

ii. Uncontrolled VOM Emissions

A. VOM Emissions from Coating Operation

[Actual Coating Usage (gal) x Coating Density (lb/gal) x VOM Content of the Coating (wt.%) ]

B. VOM Emissions from Cleanup Operation

[Actual Cleanup Solvent Usage (gal) x Solvent Density (lb/gal) x VOM Content of the Cleanup Solvent (wt.%) ]

iii. Manifested Waste

Coating Operations Manifested Waste [VOM Containing Waste (gal) x Waste Density (lb/gal) x VOM Content in Waste (wt.%) ] + Cleanup Solvent Operations Manifested Waste [VOM Containing Waste (gal) x Waste Density (lb/gal) x VOM Content in Waste (wt.%) ].

iv. Total VOM Emissions

Controlled Emissions + Uncontrolled Emissions - Manifested Waste

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- c. i. Compliance of the affected coating lines with VOM emission limitations in Condition 7.2.3(c) shall be based on the recordkeeping requirements in Condition 7.2.9 and the formulas listed below:

$$\text{Coating VOM Emissions} = V \times D \times U$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

U = Overall coating usage (gal/mo & gal/yr)

- ii. Emissions from cleaning solvent shall be based on the recordkeeping requirements in Condition 7.2.9 and by the formulas listed below:

$$\text{Cleaning Solvent VOM Emissions} = V_1 \times D_1 \times U_1$$

Where:

V<sub>1</sub> = Percent VOM in the cleaning solvent (%)

D<sub>1</sub> = Overall cleaning solvent density (lb/gal)

U<sub>1</sub> = Overall cleaning solvent usage (gal/mo and gal/yr)

- iii. Emissions of VOM determined for annual compliance shall be achieved by the following equations:

$$\text{Total VOM Emissions} = \text{Coating Emissions} + \text{Cleaning Solvent Emissions} - \text{VOM Waste}$$

7.3 Unit 03: Natural Gas-Fired Combustion Emission Units

7.3.1 Description

Natural gas-fired boilers are used to produce steam and comfort heating at this source.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
03	Boiler #3	None

7.3.3 Applicability Provisions and Applicable Regulations

An "affected combustion emission unit" for the purpose of these unit specific conditions is a natural gas-fired boiler which is used to produce steam or comfort heating at the source.

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected natural gas-fired combustion emission units 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 unit is less than 73.2 MW (250 mmBtu/hr).
- b. The affected natural gas-fired combustion emission units are not subject to 35 IAC 216.121, Fuel Combustion Emissions Sources, because the actual heat input of each unit is less than 2.9 MW (10 mmBtu/hr).

7.3.5 Operational and Production Limits and Work Practices

The affected combustion emission units shall only be operated with natural gas as the fuel.

7.3.6 Emission Limitations

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

- a. Operation and emissions from boiler #3 shall not

exceed the following limits:

Firing Rate (mmBtu/Hr)	NO <sub>x</sub> Emissions (Tons/Mo)(Tons/Yr)	
3.35	0.12	1.47

- b. These limits are based on standard emission factors and maximum operating hours of 8,760 hrs/yr. Conversion factors of 1,000 Btu/ft<sup>3</sup> and 1 therm/100,000 Btu were used.
- c. The above limitations were established in Permit 96090045, 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 from a running total of 12 months of data.

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for affected combustion emission units to demonstrate compliance with Conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the fuel usage for the affected combustion units, Mft<sup>3</sup>/mo and Mft<sup>3</sup>/yr; and
- b. Records of monthly and annual aggregate NO<sub>x</sub>, PM, SO<sub>2</sub>, and VOM emissions from the affected combustion units shall be maintained, based on fuel usage and the

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applicable emission factors, with supporting calculations.

#### 7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected combustion units with the permit requirements within 30 days, 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.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.5.1 and 7.3.6 of this permit shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

Maximum heating capacity < 100 mmBtu/hr for each fuel combustion unit:

<u>Pollutant</u>	Natural Gas Emission Factor <u>(lb/Mft<sup>3</sup>)</u>
PM	7.6
NO <sub>x</sub>	100
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, March 1998.

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

7.4 Unit 04: Mixers for Coating Lines 4 and 10

7.4.1 Description

Coatings are prepared in 55-gallon drums, or in one of two 1000 gallon mix tanks. Once the ingredients for a given formula are added, and the contents are mixed, the batch is covered to prevent loss by evaporation. Evaporative losses not only have air quality implications, but also effect product quality. It was estimated that product quality would remain constant if the percent solids do not increase by 2% to 8%.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
04	Mixers for Coating Lines 4 and 10	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. The "affected mixers" for the purpose of these unit-specific conditions, is the equipment as listed in Condition 7.4.2.
- b. 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 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material [35 IAC 215.301].
- c. The affected mixers are subject to 35 IAC 212.322(b)(1), 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, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 1) [35 IAC 212.322(a)].

7.4.4 Non-Applicability of Regulations of Concern

- a. The affected mixers 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-10.
- b. The affected mixers are not subject to 35 IAC 215 Subpart AA, Paint and Ink Manufacturing Process, because the source is not located in an area where it applies.

7.4.5 Operational and Production Limits and Work Practices

None

7.4.6 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.

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

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

- a. Solvent usage for the affected mixers. The Permittee shall keep record of solvent (gal/batch) being charged in the affected mixers;
- b. Batch of product produced (gal/batch, gal/mo and (gal/yr);
- c. Density of each solvent used in lb/gal;

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- d. MSDS of each solvent and any other VOM containing raw material used;
- e. VOM Emissions (ton/mo and ton/yr);
- f. Solvent taken from inventory for equipment cleanup. The Permittee shall keep records of solvent (gal/mo and gal/yr) that is being used for equipment cleanup operation. Solvent usage during the equipment cleanup shall be determined from the difference of record of the solvent taken from the inventory for cleanup and the solvent sent for reclamation or solvent reclaimed. If the Permittee wants to take the credit of the solvent reclaimed, record shall be maintained indicating the reclaimed solvent in gal/mo and gal/yr; and
- g. VOM emissions from equipment cleanup (ton/mo and ton/yr).

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected mixers with the permit requirements within 30 days, 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.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance with the emission limits established in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission calculation methodology described below:

- a. Emissions from mixers:

$$\text{VOM Emissions (ton/mo)} = \text{Solvent Usage (gal/mo)} * \text{Solvent Density (lb/gal)} * \text{Emission Factor}$$

Emission Factor = 1% to 2%, this is the emission

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factor for paint manufacturing, page 6.4-1 of the AP-42, Volume I, 1996.

b. Emissions from equipment cleanup operation:

VOM Emissions (ton/mo) = Solvent Usage for equipment cleanup (gal/mo)\* Solvent Density (lb/gal)

In case of the solvent reclaimed, the solvent usage for equipment cleanup shall be determined from the difference of the solvent taken from the inventory for cleanup and solvent reclaimed.

c. Compliance provisions addressing Condition 7.4.3(b) and (c) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of the affected mixers.

## 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].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

### 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 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;
- 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. The 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

A report summarizing required monitoring 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;
- 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;

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- 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:
  - 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  
5415 North University  
Peoria, Illinois 61614
  - iii. Illinois EPA - Air Permit Section  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
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

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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

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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]:

- 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;

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- 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

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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)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - 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: \_\_\_\_\_

10.2 Attachment 2 - Particulate Matter Emissions from Process Emission Units

10.2.1 35 IAC 212.321 Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972

- a. Except as further provided in 35 IAC Part 212, 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 this Section.
- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

$$E = A(P)$$

Where:

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

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

	<u>Metric</u>	<u>English</u>
P	Mg/hr	Ton/hr
E	kg/hr	lbs/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 Ton/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	Ton/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

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- c. Limits for Process Emission Units For Which  
Construction of Modification Commenced On or After  
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Metric		English	
P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>Ton/hr</u>	<u>lbs/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	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.	3.9	10.00	8.70
13.	4.8	15.00	10.80
18.	5.7	20.00	12.50
23.	6.5	25.00	14.00
27.	7.1	30.00	15.60
32.	7.7	35.00	17.00
36.	8.2	40.00	18.20
41.	8.8	45.00	19.20
45.	9.3	50.00	20.50
90.	13.4	100.00	29.50
140.	17.0	150.00	37.00
180.	19.4	200.00	43.00
230.	22.	250.00	48.50
270.	24.	300.00	53.00
320.	26.	350.00	58.00
360.	28.	400.00	62.00
408.	30.1	450.00	66.00
454.	30.4	500.00	67.00

Where:

P = Process weight rate in Mg/hr or Ton/hr, and  
 E = Allowable emission rate in kg/hr or lbs/hr.

10.2.2 35 IAC 212.322 Process Emission Units For Which  
 Construction or Modification Commenced Prior to April 14,  
 1972.

- a. Except as further provided in 35 IAC Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour

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period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.

- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

$$E = C + A(P)$$

Where:

P = Process weight rate; and,

E = Allowable emission rate; and,

- i. For process weight rates up to 27.2 Mg/hr (30 Ton/hr):

	<u>Metric</u>	<u>English</u>
P	Mg /hr	Ton/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

- ii. For process weight rates in excess or 27.2 Mg/hr (30 Ton/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	Ton/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

- c. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972

<u>Metric</u>		<u>English</u>	
P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>Ton/hr</u>	<u>lbs/hr</u>

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0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.	8.7	10.00	19.20
13.	11.1	15.00	25.20
18.	13.8	20.00	30.50
23.	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

Where:

P = Process weight rate in Mg/hr or Ton/hr, and  
 E = Allowable emission rate in kg/hr or lbs/hr.

10.3 Attachment 3: Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment

Corrects typographical errors;

Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

Requires more frequent monitoring or reporting by the Permittee;

Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the Illinois EPA;

Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or

Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

Do not violate any applicable requirement;

Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and

An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.

Are not modifications under any provision of Title I of the CAA; and

Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

The source's suggested draft permit/conditions;

Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

Applications requesting a significant change in existing monitoring permit terms or conditions;

Applications requesting a relaxation of reporting or recordkeeping requirements; and

Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or

Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be

FINAL DRAFT/PROPOSED CAAPP PERMIT

DCP-LOHJA, Inc.

I.D. No.: 103806AAF

Application No.: 95090069

February 1, 2001

certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.

TK:jar



<b>Application For Construction Permit (For CAAPP Sources Only)</b>	For Illinois EPA use only
	ID number:
	Permit number:
Date received:	

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. ID number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

### Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA?  Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

### Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.									
30.	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.  Authorized Signature:  BY: <table style="width: 100%; margin-top: 10px;"> <tr> <td style="width: 50%; text-align: center;">_____</td> <td style="width: 50%; text-align: center;">_____</td> </tr> <tr> <td style="text-align: center;">AUTHORIZED SIGNATURE</td> <td style="text-align: center;">TITLE OF SIGNATORY</td> </tr> <tr> <td style="width: 50%; text-align: center;">_____</td> <td style="width: 50%; text-align: center;">_____ / _____ / _____</td> </tr> <tr> <td style="text-align: center;">TYPED OR PRINTED NAME OF SIGNATORY</td> <td style="text-align: center;">DATE</td> </tr> </table>	_____	_____	AUTHORIZED SIGNATURE	TITLE OF SIGNATORY	_____	_____ / _____ / _____	TYPED OR PRINTED NAME OF SIGNATORY	DATE
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AUTHORIZED SIGNATURE	TITLE OF SIGNATORY								
_____	_____ / _____ / _____								
TYPED OR PRINTED NAME OF SIGNATORY	DATE								

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

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.

DCP-LOJHA, Inc. is located at 1101 Warp Road in Dixon. The source is a coating plant applying silicon release coating to paper and plastic substrates on four (4) coating lines. Two coating lines operate with non-VOM coatings only. The other two are equipped with afterburners to control organic emissions. In general the source has a total of four coating lines, three natural-gas fired boilers, and six above-ground storage tanks.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Coating Lines No.1 and No.2	1970 & 1965	None
02	Coating Lines No.4 and No.10	1965 & 1987	Thermal Oxidizer (Afterburner)
03	Natural Gas-Fired Combustion Emission Units	1996	None
04	Mixers for Coating Lines No.4 and No.10	1965	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
Volatile Organic Material (VOM)	315
Sulfur Dioxide (SO <sub>2</sub> )	---
Particulate Matter (PM)	3.3
Nitrogen Oxides (NO <sub>x</sub> )	27.9
HAP, not included in VOM or PM	---
TOTAL	346.2

This permit is a combined Title I/CAAPP permit that 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 by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

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.

V. PROPOSED 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.

TK:jar