

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

La-Co Industries Inc.
Attn: Richard Lytton
1201 Pratt Boulevard
Elk Grove Village, Illinois 60007

Application No.: 95030004 I.D. No.: 031440AKH
Applicant's Designation: Date Received: May 22, 2000
Subject: Chemical Compounds Manufacturing Plant
Date Issued: August 7, 2000 Expiration Date: January 26, 2003
Location: 1201 Pratt Boulevard, Elk Grove Village

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of two sealant/joint compound/flux manufacturing lines controlled by two dust collectors, hand cleaner/gas leak detector manufacturing line, wax marking stick manufacturing line controlled by a dust collector, hot steel marker manufacturing line controlled by a scrubber, three crayon grinding/mixing/pressing lines controlled by two dust collectors, and glass marker manufacturing line as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/yr for volatile organic material (VOM), 10 tons/yr for a single hazardous air pollutant (HAPs), and 25 tons/yr for all HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all current operating permits issued for this location.
- 2a. Usage of volatile organic materials (VOM) in the raw materials and VOM emissions from the three crayon grinding/mixing/pressing lines shall not exceed 0.3 ton/mo and 3.0 ton/yr. Compliance with annual limits shall be determined from a running total of 12 months of data.
- b. This permit is issued based on negligible emissions of particulate matter from the three crayon grinding/mixing/pressing lines. For this

purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

- 3a. Operation and PM emissions from the two sealant/joint compound/flux manufacturing lines shall not exceed the following limits:

Solids Usage		Emission	Control	PM Emissions	
(Ton/Mo)	(Tons/Yr)	Factor (Wt.%)	Efficiency (%)	(Lb/Mo)	(Ton/Yr)
100	750	1	95	0.05	0.4

These limits are based on the maximum production rate and standard emission factor (AP-42, 6.4). Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. This permit is issued based on negligible emissions of volatile organic materials from the two sealant/joint compound/flux manufacturing lines. For this purpose, emissions from each emission source shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
4. Total combined operation and emissions from the hand cleaner/gas leak detector manufacturing operation shall not exceed the following limits:

Process Rate		VOM Emissions	
(Ton/Mo)	(Tons/Yr)	(Ton/Mo)	(Ton/Yr)
5.6	66.7	0.08	1.00

These limits are based on the maximum production rate, a material balance of maximum solvent usage (propylene glycol) and an emission factor of 1.5% (AP-42 6.4). Compliance with annual limits shall be determined from a running total of 12 months of data.

5. Total combined operation and emissions from the glass markers manufacturing operation shall not exceed the following limits:

Process Rate		VOM Emissions	
(Ton/Mo)	(Tons/Yr)	(Ton/Mo)	(Ton/Yr)
10	120	0.15	1.8

These limits are based on the maximum production rate and an emission factor of 1.5% (AP-42 6.4). Compliance with annual limits shall be determined from a running total of 12 months of data.

6. This permit is issued based on negligible emissions of particulate matter from the hand cleaner/gas leak detector and glass markers manufacturing lines. For this purpose, emissions from each emission source shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

7. Total combined source-wide usage of Glycol Ether in clean-up operations and HAP emission shall not exceed 3.0 tons/yr. Compliance with annual limits shall be determined from a running total of 12 months of data.

8. The emissions of hazardous air pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAPs from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
9. The Permittee shall keep records of the following item(s):
 - a. The names and amounts (ton/mo and ton/yr) of all raw materials used;
 - b. VOM and HAP content of raw materials (Wt. %)
 - c. VOM and HAP emission calculations (ton/mo and tons/yr).
10. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying upon an Illinois EPA or USEPA request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
11. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, a description of the exceedances or violation, and efforts to reduce emissions and future occurrences.
12. Two (2) copies of required reports and notifications concerning equipment operation, performance testing, or monitoring shall be sent to the following address, unless otherwise indicated:

Illinois Environmental Protection Illinois EPA
Bureau of Air
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address, unless otherwise indicated:

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control - Regional Office
Eisenhower Tower
1701 First Avenue
Maywood, Illinois 60153

Page 4

It should be noted that this permit has been revised to include operation of two dust collectors described in the Construction Permit 00050060 and to reflect changes in raw materials usage on sealant/joint compound/flux and crayon grinding/mixing/pressing manufacturing lines. This revision does not relax monitoring, recordkeeping, or reporting requirements contained in federally enforceable conditions of this permit. These permit conditions assure that this source would not be a major source for purpose of CAAPP.

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

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

DES:VJB:jar

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
USEPA

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the chemical compounds manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario, which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 25 tons/yr for volatile organic material (VOM), and hazardous air pollutants (HAPs) to less than 10 tons/yr of any single HAP or 25 tons/yr of any combination of HAPs, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program.

- 1a. Usage of volatile organic materials (VOM) in the raw materials and VOM emissions from the three crayon grinding/mixing/pressing lines shall not exceed 0.3 ton/mo and 3.0 ton/yr. Compliance with annual limits shall be determined from a running total of 12 months of data.
- b. This permit is issued based on negligible emissions of particulate matter from the three crayon grinding/mixing/pressing lines. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- 2a. Operation and PM emissions from the two sealant/joint compound/flux manufacturing lines shall not exceed the following limits:

Solids Usage		Emission Factor	Control Efficiency	PM Emissions	
(Ton/Mo)	(Tons/Yr)	(Wt.%)	(%)	(Lb/Mo)	(Ton/Yr)
100	750	1	95	0.05	0.4

This permit is issued based on negligible emissions of volatile organic materials from the two sealant/joint compound/flux manufacturing lines. For this purpose, emissions from each emission source shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

3. Total combined operation and emissions from the hand cleaner/gas leak detector manufacturing operation shall not exceed the following limits:

Process Rate		VOM Emissions	
(Ton/Mo)	(Tons/Yr)	(Ton/Mo)	(Ton/Yr)
5.6	66.7	0.08	1.00

4. Total combined operation and emissions from the glass markers manufacturing operation shall not exceed the following limits:

Process Rate		VOM Emissions	
(Ton/Mo)	(Tons/Yr)	(Ton/Mo)	(Ton/Yr)
10	120	0.15	1.8

5. This permit is issued based on negligible emissions of particulate matter from the hand cleaner/gas leak detector and glass markers manufacturing lines. For this purpose, emissions from each emission source shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

6. Total combined source-wide usage of Glycol Ether in clean-up operations and HAP emission shall not exceed 3.0 tons/yr. Compliance with annual limits shall be determined from a running total of 12 months of data.
7. The emissions of hazardous air pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAPs from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

VJB:jar