



(Continued)

<u>Coating</u>	<u>Usage</u>		<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>		<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
Thinner	300	1,800	VOM	1,767.4	5.3
Cleaning Solvents	105	700	VOM	493.5	2.3
Adhesive	75	500	VOM	9.75	0.04
Air Make-Up Units			VOM		0.09
			NO <sub>x</sub>		1.72
			CO		1.44

These limits are based on 100% evaporation of VOM and HAP content and standard AP-42 emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas shall be the only fuel fired in the air make-up units.
4. The Permittee shall maintain monthly and annual records of the following items:
- a. VOM and HAP content (lb/gal), VOM and HAP emissions (lb/month and ton/year), and usage (gallon/month and gallon/year) of the following;
    - i. Wood Coatings,
    - ii. Thinner,
    - iii. Cleaning Solvents, and
    - iv. Adhesives
  - b. Must comply with recordkeeping requirements in 35 Ill. Adm. Code 218.211.
  - c. Natural gas usage (mmscf/month and mmscf/year).
5. 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 by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

6. Must comply with good operating practices set forth in 35 Ill. Adm. Code 218.217.
7. 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, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
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 Agency  
Division of Air Pollution Control  
Eisenhower Tower  
1701 South First Avenue  
Maywood, Illinois 60153

9. Annual emissions of volatile organic material (VOM) shall not exceed 24.73 tons, which shall be the permitted emissions for this site.

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

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

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cc: Illinois EPA, FOS Region 1  
Illinois EPA, Compliance Section  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from wood coating operation 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 well below the levels, e.g., 25 tons per year of VOM, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

- 1a. Emissions and operation of the wood coating operation shall not exceed the following limits:

<u>Coating</u>	<u>Usage</u>		<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>		<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
Wood Coatings (Stains, Varnishes, Lacquers and Sealers)	2,000	12,000	VOM	5,667	17.0
Thinner	300	1,800	VOM	1,767.4	5.3
Cleaning Solvents	105	700	VOM	493.5	2.3
Adhesive	75	500	VOM	9.75	0.04
Air Make-Up Units			VOM		0.09
			NO <sub>x</sub>		1.72
			CO		1.44

These limits are based on 100% evaporation of VOM and HAP content and standard AP-42 emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas shall be the only fuel fired in the air make-up units.
2. Annual emissions of volatile organic material (VOM) shall not exceed 24.73 tons, which shall be the permitted emissions for this site.

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## I. INTRODUCTION

F.C.I., Inc. is currently seeking a Federally Enforceable State Operating Permit (FESOP), which would limit their emissions to below major thresholds. By obtaining a FESOP they can operate as a non-major source for the purposes of the Clean Air Act Permit Program (CAAPP). Coatings, thinners, clean-up solvents, and adhesive usages and fuel usage limitations, as well as monitoring and recordkeeping requirements contained in this FESOP have prevented this facility from attaining major source levels now and in the future. These conditions would be enforceable by both Illinois EPA and USEPA.

## II. SOURCE DESCRIPTION

F.C.I., Inc. operates a wood furniture coating operation. The current operation involves using various stains, varnishes, lacquers, sealers, thinners, adhesives, and clean-up solvents, which contain volatile organic material (VOM), and small air make-up units fired by natural gas.

## III. EMISSIONS

The main source of emissions comes from the use of the various coatings, thinners, adhesives, and clean-up solvent on the future, which emits VOM as it dried, also carbon monoxide (CO) and nitrous oxides (NO<sub>x</sub>) are emitted from the combustion of natural gas.

## 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. The Board has standards for sources of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO) and volatile organic material (VOM). A wood furniture coating operation is subject to Title 35 Section 218 Subpart F. The wood coating usage is subject to 35 IAC 218.204(L) and coatings recordkeeping requirements must comply with 35 IAC 218.127. This site readily complies with all applicable Board standards.

## V. PROPOSED PERMIT

The conditions of the proposed permit contain limitations and requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on coatings usage, clean-up solvent usage, thinner usage, adhesive usage, and fuel usage. These limitations are consistent with the operation and capacity of the facility.

The permit conditions also establish appropriate compliance procedures, including inspection practices, recordkeeping requirements, and reporting requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the facility is operating within the limitations set by the permit and are properly controlling emissions.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this facility meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois EPA is therefore proposing to issue a permit with federally enforceable limits for this operation.

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 166.

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