

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

CP-D Acquisition Company, LLC
Attn: Roy Galman
12701 South Ridgeway Avenue
Alsip, Illinois 60803

Application No.: 02040026

I.D. No.: 031003ADP

Applicant's Designation:

Date Received: December 7, 2004

Subject: Paper Coating Operation

Date Issued:

Expiration Date:

Location: 12701 South Ridgeway Avenue, Alsip

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

- 3 Corrosion Inhibitor (CI) Coating and Printing Lines
- 1 Wax Coating Line
- 2 CI/Wax Mixing Tanks

as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special conditions:

- 1a. This federally enforceable state operating permit is issued to limit the emissions of volatile organic material (VOM) from the source to less than major source thresholds, i.e., VOM to less than 25 tons per year, as further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2. This permit is issued based on the potential to emit (PTE) for hazardous air pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act being less than 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such less quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program (CAAPP) permit from the Illinois EPA.
- 3a. Emissions and operation of 3 CI coating and printing lines shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>Emission</u>	<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Lb/Yr)</u>	<u>Factor</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
CI Coatings	95,616	1,125,800	2.93	2,802	16.49
Inks	170	2,000	100.00	170	1.00

- b. These limits are based on the gravimetric testing, maximum material application rates, 8,760 hours of operation and the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.
- 4a. Emissions and operation of the wax coating line shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lb/Month)</u>	<u>(Lb/Year)</u>	<u>(Lb/Month)</u>	<u>(Tons/Year)</u>
Wax Laminating Coating	995	11,720	995	5.86

These limits are based on VOM usage = material usage x material VOM content, complete volatilization of the VOM content of the material, maximum application rates, 8,760 hours of operation and the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Pursuant to 35 Ill. Adm. Code 218.204(c), the wax laminating coating's VOM content shall not exceed 2.3 lbs/gallon, minus water and other exempted compounds.
- 5. This permit is issued based on negligible emissions of volatile organic material (VOM) from the 2 CI/wax mixing tanks. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- 6. Pursuant to Adjusted Standard AS 03-5, issued on September 18, 2003 and amended on November 20, 2003:
 - a. Pursuant to Section 28.1 of the Environmental Protection Act, The board grants CP-D Acquisition Company, LLC an adjusted standard from 35 Ill. Adm. Code 218.204(c) effective September 18, 2003. The Adjusted Standard applies to the equipment and emission sources at this facility.
 - b. The 2.3 pounds of volatile organic material (VOM) per gallon of coating applied limitation of 35 Ill. Adm. Code 218.204 (c) does not apply. Instead, CP-D Acquisition Company, LLC is subject to the following:
 - i. The Total VOM Emissions from this Cromwell-Phoenix, Inc facility must not exceed 25 Tons per year;
 - ii. The Versil Pak Wax laminating coatings must continue to meet the limitations of 35 Ill. Adm. Code 218.204 (c);
 - iii. The web fed and sheet fed corrosion inhibiting (CI) coating and printing lines must use CI solutions which, as applied, do not exceed 8.3 lb of VOM per gallon of coating, less water;

- iv. CP-D Acquisition Company, LLC must operate in full compliance with all other applicable provisions of 35 Ill. Adm. Code Part 218, including but not limited to Subpart F;
 - v. CP-D Acquisition Company, LLC must continue to investigate CI coatings with a reduced VOM content. Where practicable, CP-D Acquisition Company, LLC must substitute current coatings with lower VOM content coatings as long as such substitution does not result in a net increase in VOM emissions. Beginning on October 1, 2004 CP-D Acquisition Company, LLC must prepare and submit each year an annual report summarizing the activities and results of these investigative efforts. This annual report must be submitted to the Illinois EPA Bureau of Air Compliance and Enforcement Unit;
 - vi. CP-D Acquisition Company, LLC must operate in full compliance with the Clean Air Act, Illinois Environmental Protection Act, and any other applicable regulations.
 - vii. CP-D Acquisition Company, LLC must continue to report all annual emissions to the Illinois EPA in accordance with the requirements of 35 Ill. Adm. Code Part 254.
7. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
8. The Permittee shall maintain the following records:
- a. Name, Usage (lb/day, lb/month and lb/year), VOM and HAP contents, Emissions rates, and VOM and HAP emissions for the following material:
 - i. CI coatings including testing compositions;
 - ii. Inks;
 - iii. Wax laminates,
 - b. VOM content minus water and other exempt compounds of the CI coatings and Wax laminates;
 - c. VOM emission from mixers; and
 - d. Total VOM and HAP emissions of the facility (all sources) (lb/month and tons/year).
9. 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 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 request for records during the course of a source inspection.

10. 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.
11. 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
9511 West Harrison
Des Plaines, Illinois 60016

Please note that this permit is revised to add inks to Condition 3a.

If you have any questions on this, please call George Kennedy 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
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission of an affected paper coating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency used the annual operating scenario, which results in maximum emissions from such a plant. Limiting usage of VOM and HAP containing materials to levels below major status and basing emissions are equal to the usage of these materials. The resulting maximum emissions are below the levels, e.g., 25 tons per year of combined total HAPs, 10 tons per year of a single HAP, and 25 tons per year of volatile organic material, at which a plant would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this facility will be less than predicted in this summary to the extent that the plant uses less of material, gaseous fuel is used, and control measures are more effective than required by this permit.

<u>Equipment/Process</u>	EMISSIONS (Tons/Year)					
	<u>PM</u>	<u>NO_x</u>	<u>CO</u>	<u>SO₂</u>	<u>VOM</u>	<u>HAP</u>
3 CI Coating	--	--	--	--	16.49	1.00
Inks	--	--	--	--	1.00	--
Wax Coating Line	--	--	--	--	5.86	2.00
2 Mixing Tanks (Total)	--	--	--	--	0.88	--
Total:	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u>24.23</u>	<u>3.00</u>

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PROJECT SUMMARY

I. INTRODUCTION

CP-D Acquisition Company, LLC has voluntarily submitted an application for renewal of a Federally Enforceable State Operating Permit for the paper coating facility. These limits would prevent the coating operation from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. The permit would contain conditions to assure that the facility is operated as a non-major source. These conditions would be enforceable by both the USEPA and the Illinois EPA.

II. PROJECT DESCRIPTION

CP-D Acquisition Company, LLC impregnates paper with various corrosion proactive coating. The facility uses various low vapor pressure volatile organic materials (VOM) on the coating lines. The coating lines apply coatings and inks to the paper.

III. EMISSIONS

The principal air contaminant emitted from the coating lines is VOM. The VOM emission from these emission units are assumed based on a gravimetric testing that was performed by CP-D Acquisition Company, LLC and complete volatilization of the inks and waxes.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board emission standards. The Board's emission standard represents the basic requirements for sources in Illinois. The Board has standards for sources of VOM. CP-D Acquisition Company, LLC complies with all applicable standards through direct compliance or through an adjusted standard.

V. PROPOSED PERMIT

The conditions of the proposed permit contain limitations and requirements to assure that this source will be operated as a non-major source. The permits set limitations on the material usage, VOM content of materials and emissions. These limitations are consistent with the historical operation. The VOM are based on the amount of material used and air pollution control efficiency.

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

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 project.

The Illinois EPA and the proposed condition of the draft permit request comments on this proposed action. 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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