

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Tredegar Film Products - Lake Zurich, Inc.
Attn: L.W. Slupianek
351 North Oakwood Road
Lake Zurich, Illinois 60047

Application No.: 91020100 I.D. No.: 097085ABE
Applicant's Designation: Date Received: September 1, 2000
Subject: Plastic Film Mfg.
Date Issued: November 20, 2000 Expiration Date: October 18, 2001
Location: 351 North Oakwood Road, Lake Zurich

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of blown film, cast film, R & D pilot line, and cast oriented elastomeric film manufacturing processes. Each process consists of extruders, resin transport systems with baghouse filters, resin blending units with filters, and regrinders pursuant to 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 emission of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for VOM, 10 tons/year of a single HAP and 25 tons/year for total HAPs), as further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act 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 permit(s) for this location.
- 2. Upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of Section 218 of 35 Ill. Adm. Code, Subparts TT, shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
- 3a. Emissions and operation of blown film manufacturing process shall not exceed the following limits:

Polypropylene/polyethylene Pellet Usage		VOM Emissions	
<u>tons/mo</u>	<u>tons/yr</u>	<u>lb/mo</u>	<u>tons/yr</u>
2292	27,500	1284	7.7

These limits are based on maximum material usage and VOM emissions were determined based on an emission factor of 278×10^{-6} lb VOM/lb of material usage developed by the facility.

- b. Compliance with annual limits shall be determined from a running total of 12 months of data.
- 4a. Emissions and operation of cast film manufacturing and R & D pilot line processes shall not exceed the following limits:

Polypropylene/polyethylene Pellet Usage		VOM Emissions	
<u>tons/mo</u>	<u>tons/yr</u>	<u>lb/mo</u>	<u>tons/yr</u>
4,200	50,000	2,317	13.9

These limits are based on maximum material usage and VOM emissions were determined based on an emission factor of 278×10^{-6} lb VOM/lb of material usage developed by the facility.

- b. Compliance with annual limits shall be determined from a running total of 12 months of data.
- 5a. Emissions and operation of extraflex film manufacturing process shall not exceed the following limits:

Polypropylene/polyethylene Pellet Usage		VOM Emissions	
<u>tons/mo</u>	<u>tons/yr</u>	<u>lb/mo</u>	<u>tons/yr</u>
834	10,000	467	2.8

These limits are based on maximum material usage and VOM emissions were determined based on an emission factor of 278×10^{-6} lb VOM/lb of material usage developed by the facility.

- b. Compliance with annual limits shall be determined from a running total of 12 months of data.
- 6a. Emissions and operation of boilers shall not exceed the following limits:

Gas Consumption		VOM Emissions	
<u>mmft³/mo</u>	<u>mmft³/yr</u>	<u>lb/mo</u>	<u>tons/yr</u>
8.4	100	44	0.3

These limits are based on maximum gas consumption and standard emission factor. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas shall be the only fuel used in boilers and space heaters.

7a. The emissions of hazardous air pollutants as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single hazardous air pollutant or 25 tons per year of any combination of such hazardous air pollutants, 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.

i. Emissions of hazardous air pollutants (HAPs), as listed in Section 112(b) of the Clean Air Act, shall not exceed the following limits:

<u>Item</u>	<u>HAPs Emissions</u>	
	<u>tons/month</u>	<u>tons/year</u>
Individual HAP	0.73	8.8
All HAPs	1.96	23.5

This general HAP emission limit is to restrict the source below major source HAP levels and provide operational flexibility.

b. Compliance with annual limits shall be determined from a running total of 12 months of data.

8a. The Permittee shall maintain records of the following items:

- i. Polyethylene/polypropylene usage in each process (tons/mo and tons/yr)
- ii. Records which indicate the VOM emission factor development and an explanation showing why the emission would be representative of these processes.
- iii. MSDS of all materials
- iv. VOM emissions from each process (lb/mo and tons/yr)
- v. HAP emission (lb/mo & tons/yr)
- vi. Maintenance records of all control equipment
- vii. Gas consumption (ft³/mo & ft³/yr)

b. 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 Agency and 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 request for records during the course of a source inspection.

9. If there is an exceedance of the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a report to the Agency's Compliance Unit 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.

10. All reports, notification, etc. shall be sent to:

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

and

Illinois Environmental Protection Agency
Division of Air Pollution Control - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

11. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.

12. This permit is issued, based on the addition of the R & D pilot line without any increase in emissions to the atmosphere.

It should be noted that equipment from construction permit #00090002 has been incorporated into this permit.

If you have any questions on this permit, please call John Blazis at 217/782-2113.

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

DES:JPB:psj

cc: IEPA, FOS Region 1
IEPA, Compliance Unit
USEPA

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the plastic film 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. This plant will use 87,500 tons/yr of polyethylene/polypropylene resin and will combust 100 mmft³/yr of natural gas. The resulting maximum emissions well below the levels, e.g., 25 tons/year of VOM, 10 tons/year of single HAP and 25 tons/yr of total HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program.

1. Emissions of VOM from the plant:

<u>Process</u>	<u>Process Rate</u>		<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
a. Blown Film Manufacturing	2,292	27,500	1,284	7.7
b. Cast Film Manufacturing and R & D Pilot Line	4,200	50,000	2,317	13.9
c. Extraflex Film Manufacturing	834	10,000	467	2.8

d. This table defines the potential emissions of VOM from the plant.

e. Emission of hazardous air pollutants (HAPs), as specified in Appendix A of the Clean Air Act, shall not exceed the following limits:

<u>Item</u>	<u>HAPs Emissions</u>	
	<u>tons/month</u>	<u>tons/year</u>
Individual HAP	0.73	8.8
All HAPs	1.96	23.5

f. Fuel Combustion Emissions:

<u>Gas Consumption</u>		<u>VOM</u>		<u>TSP</u>		<u>NO_x</u>		<u>CO</u>	
<u>mmft³/mo</u>	<u>mmft³/yr</u>	<u>lb/mo</u>	<u>ton/yr</u>	<u>lb/mo</u>	<u>ton/yr</u>	<u>lb/mo</u>	<u>ton/yr</u>	<u>lb/mo</u>	<u>ton/yr</u>
9	100	44	0.3	100	0.6	834	5.0	175	1.05

This table defines the potential emissions of gas combustion units.