

217/782-2113

LIFETIME OPERATING PERMIT

PERMITTEE

Ennis Paint
Attn: Demarco Doxie
1855 Plymouth Road NW
Atlanta, Georgia 30318

Application No.: 89030068 I.D. No.: 031201ACZ
Applicant's Designation: ENNISLOPAP Date Received: July 24, 2009
Subject: Reflector Manufacturing Facility
Date Issued: August 12, 2009 Expiration Date: See Condition 1.
Location: 6565 West Howard Street, Niles, Cook County, 60714

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

Adhesive Applicator
Marker Coating Line
2 Potting Lines
2 Glassing Lines
4 Vacuum Metallizers
Caustic Cleaning Tank

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

- 1a. This operating permit shall expire 180 days after the Illinois EPA sends a written request for the renewal of this permit.
- b. This permit shall terminate if it is withdrawn or is superseded by a revised permit.
- 2a. Emissions and operation of 2 potting lines, 2 glassing lines, adhesive applicator, and marker coating line shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Lb/Yr)</u>		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Adhesives, Hardeners, Alcohol, Cleaning Solvent, and Marker Coatings	3,168	31,680	VOM	1.59	15.84

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

- b. Marker coating (clear coat) shall maintain compliance with 35 Ill. Adm. Code 218.204(j)(1).
 - c. This permit is issued based on negligible emissions of Particulate Matter (PM) from 4 vacuum metallizers and caustic cleaning tank. For this purpose PM emissions from each emission source shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
 - d. 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/year of any single HAP and 25 tons/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. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
 - b. The Permittee shall comply with the opacity limitations of 35 Ill. Adm. Code 212.123 and the particulate matter emission limitations of 35 Ill. Adm. Code 212.321.
4. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 8 lbs/hour of organic material into the atmosphere from any emission source, except as provided in Sections 218.302, 218.303, 218.304, and the following exception: If no odor nuisance exists this limitation shall apply only to photochemically reactive material.
 5. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the equipment covered under this permit such that the equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
 6. In the event that the operation of the emission units 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.
 7. The Permittee shall maintain the following monthly records:
 - a. Name, Usage (gallons/month and gallons/year), VOM and HAP content (lbs/gallon or % weight) and VOM and HAP emissions for the following materials:
 - i. Coatings;
 - ii. Adhesives;
 - iii. Hardeners;

- iv. Thinners; and
 - v. Clean up Solvents.
 - b. VOM content (lbs/gallon) of the marker coating as applied minus water and other exempt compounds;
 - c. VOM, PM, and HAP emissions (tons/month and tons/year) with supporting calculations.
- 8. 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, unless otherwise specified, 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.
- 9. If there is an exceedance of or deviation from 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/deviation. 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 deviation and efforts to reduce emissions and future occurrences.
- 10. Two (2) copies of required reports and notifications 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
- 11. Persons with lifetime operating permits must obtain a revised permit for any of the following changes at the source:
 - a. An increase in emissions above the amount the emission unit or the source is permitted to emit;
 - b. A modification;
 - c. A change in operations that will result in the source's noncompliance with conditions in the existing permit; or

- d. A change in ownership, company name, or address, so that the application or existing permit is not longer accurate.

It should be noted that the 3.1 mmBtu/hour boiler is exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(c).

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

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:GMK:psj

cc: Region 1