

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

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: May 18, 2001  
Subject: Plastic Film Mfg.  
Date Issued:                                      Expiration Date:  
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 extraflex film manufacturing processes and wipe cleaning operations. 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.
3. Emissions and operation of blown film manufacturing process shall not exceed the following limits:

Polypropylene/polyethylene		VOM Emissions	
Pellet Usage			
<u>tons/mo</u>	<u>tons/yr</u>	<u>tons/mo</u>	<u>tons/yr</u>
2,500	25,000	0.7	7.0

These limits are based on maximum material usage and an emission factor of 0.56 lb VOM/ton of material usage as established by the company. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. 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>ton/mo</u>	<u>tons/yr</u>
5,000	50,000	1.4	14.0

These limits are based on maximum material usage and an emission factor of 0.56 lb VOM/ton of material usage as established by the company. Compliance with annual limits shall be determined from a running total of 12 months of data.

5. 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>ton/mo</u>	<u>tons/yr</u>
1,000	10,000	0.28	2.8

These limits are based on maximum material usage and an emission factor of 0.56 lb VOM/ton of material usage as established by the company. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 6a. Emissions and operation of all fuel combustion emission sources shall not exceed the following limits:

Gas Consumption		VOM Emissions	
<u>mmft<sup>3</sup>/mo</u>	<u>mmft<sup>3</sup>/yr</u>	<u>tons/mo</u>	<u>tons/yr</u>
10.0	100	0.1	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 all the fuel combustion emission sources. Use of any fuel other than natural gas requires a permit revision.
7. Emissions of volatile organic material (VOM) and operation of the wipe cleaning process shall not exceed the following limits:

<u>Solvent Usage</u> (Gal/Mo)	<u>Solvent Usage</u> (Gal/Yr)	<u>VOM Content</u> (Lb/Gal)	<u>VOM Emissions</u> (Tons/Mo)	<u>VOM Emissions</u> (Tons/Yr)
20	200	6.51	0.07	0.7

These limits define the potential emissions of VOM and are based on maximum material usages, maximum VOM content, and limits as requested by the company. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

8. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
9. This permit is issued based on negligible emissions of particulate matter from the blown film, cast film, R & D pilot, and extraflex film processes. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
10. The Permittee shall maintain records of the following items:
  - i. Polyethylene/polypropylene usage in each process (tons/month and tons/year)
  - ii. Amount of solvent used in the wipe cleaning process (gallons/month and gallons/year)
  - iii. VOM content of the solvent used in the wipe cleaning process (lb/gallon)
  - iv. Records which indicate the VOM emission factor development and an explanation showing why the emission would be representative of these processes.
  - v. MSDS of all materials
  - vi. Detailed calculations of VOM and individual HAP emissions from each process (tons/month and tons/year)
  - vii. Maintenance records of all control equipment
  - viii. Gas consumption (mmft<sup>3</sup>/month and mmft<sup>3</sup>/year)
11. 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.

12. 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.

13. 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

14. 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.

15. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: Monthly polypropylene/polyethylene usage, monthly solvent usage, and VOM content of the solvent.

It should be noted that equipment from construction permit 01070034 has been incorporated into this permit to include the wipe cleaning operation with no increase in emissions of VOM.

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If you have any questions on this permit, please call Tara T. Nguyen-Ede at 217/782-2113.

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

DES:TNE:psj

cc: IEPA, FOS Region 1  
IEPA, Compliance Unit  
Lotus Notes

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. 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>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Blown Film Manufacturing	2,500	25,000	0.7	7.0
Cast Film Manufacturing and R & D Pilot Line	5,000	50,000	1.4	14.0
Extraflex Film Manufacturing	1,000	10,000	0.28	2.8
Wipe Cleaning Process	20 Gal	200 Gal	0.07	0.7
		Total	2.45	24.5

These limits define the potential emissions of VOM and are based on maximum material usage and an emission factor of 0.56 lb VOM/ton of material usage for the film manufacturing processes. Compliance with annual limits shall be determined from a running total of 12 months of data.

2. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

3a. Emissions and operation of all fuel combustion emission sources shall not exceed the following limits:

<u>Material</u>	<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
				<u>Factor</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
				<u>(Lb/mmscf)</u>		
Natural Gas	10	100	NO <sub>x</sub>	100	0.5	5.0
			CO	84	0.42	4.2
			TSP	7.6	0.1	0.4
			VOM	5.5	0.1	0.3

These limits define the potential emissions of NO<sub>x</sub>, CO, TSP and VOM and are based on maximum fuel usage and standard 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 used in all the fuel combustion sources. Use of any other fuel other than natural gas requires a permit revision.
  
- 4. This permit is issued based on negligible emissions of particulate matter from the blown film, cast film, R & D pilot, and extraflex film processes. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.

DES:TNE:psj