

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - NSPS SOURCE

PERMITTEE

Press-On Tape & Gasket Corp.
Attn: Steven Atlas
1020 South Westgate
Addison, Illinois 60101

Application No.: 99100007
Applicant's Designation:
Subject: Adhesive Tape Manufacturing
Date Issued: February 24, 2004
Location: 1020 South Westgate, Addison
21 Factory Road, Addison
100 Laura Drive, Addison

I.D. No.: 043005AMQ
Date Received: October 1, 1999
Expiration Date: February 24, 2009

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

Equipment at 1020 South Westgate:

Coating Line with Afterburner (Line 1)
Coating Line (Line 2)
Hot Melt Coater

Equipment at 21 Factor Road:

Spray Coater

Equipment at 100 Laura Drive:

2 Liquid Coaters

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 emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) to less than 25 tons/year, total combined hazardous air pollutants (HAPs) to less than 25 tons/year and single hazardous air pollutant to less than 10 tons/year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- 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. 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).
- 3a. Coating Line (Line 2) is subject to New Source Performance Standards (NSPS), 40 CFR 60 Subparts A and RR. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 60.445(d), the Permittee shall maintain a 12 month record of the amount of solvent applied in the coating for Line 2.
4. Emissions and operation of Line 1 shall not exceed the following limits:

<u>Equipment</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
Line 1 Coatings (w/ Afterburner)	22,134	132.8	1,107	6.64
Line 1 Coatings (w/out Afterburner)	100	0.2	100	0.20
Clean-Up Solvent	167	1.0	84	0.50

These limits are based on complete volatilization of the VOM content of the materials, 95% overall control efficiency for the afterburner based on compliance testing, VOM usage = VOM content x material usage, the use of shop towels during clean up, and the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

5. Emissions and operation of Line 2 shall not exceed the following limits:

<u>Equipment</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
Line 2 Coatings	2,400	14.4	2,400	14.40
Clean-Up Solvent	167	1.0	84	0.50

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

6. This permit is issued based on negligible emissions of volatile organic material (VOM) from the hot melt coater, spray coater, and 2 liquid coaters. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.

7. The Permittee shall operate Line 1 (with afterburner in operation) in compliance with 35 Ill. Adm. Code 218.207(b)(1), which states afterburner shall be operated in manner that maintains 81% overall efficiency and 90% destruction across the afterburner.
8. The Permittee shall operate Line 1 (without the afterburner in operation) when applying coatings that are in compliance with 35 Ill. Adm. Code 218.204(c) VOC limit of 2.3 lb/gallon (minus water and other exempted compounds) or less.
9. The Permittee shall operate Line 2 to demonstrate compliance with 35 Ill. Adm. Code 218.204(c) by maintaining records that indicate a daily weighted average VOC limit of 2.3 lb/gallon (minus water and other exempted compounds) or less, pursuant to 35 Ill. Adm. Code 218.205(a).
- 10a. The afterburner shall be in operation at all times when Line 1 applying coatings (as applied) that are not in compliance with 35 Ill. Adm. Code 218.204(c).
- b. The afterburner combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This temperature shall be maintained during operation.
- c. The afterburner shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor's specifications at all times that the afterburner is in use. This device shall monitor the temperature rise across each catalytic afterburner bed or VOM concentration.
- d. The Permittee shall collect and record the following information each day;
 - i. Afterburner combustion chamber monitoring data.
 - ii. A log of operating time for the capture system, afterburner, monitoring device, and the associated emission unit(s).
 - iii. A maintenance log for the capture system, afterburner, and monitoring device detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- e. All records shall be maintained for three years and be made available to the Illinois EPA for inspection or copying upon request.
- f. Any record showing a violation of the conditions of this permit or 35 Ill. Adm. Code 218.207(b)(1), shall be reported by sending a copy of such record within 30 days following the occurrence of the violation.

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. The Permittee shall maintain records of the vendor recommendations at the facility and be available for inspection and copying by the Illinois EPA.
13. 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.
14. The Permittee shall maintain the following records:
 - a. Pursuant to 35 Ill. Adm. Code 218.211(d) (2), the Permittee shall maintain the following each day for each coating for Line 2:
 - i. Name and identification number of each coating as applied;
 - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating; and
 - iii. The daily weighted average VOM content of all coatings as applied.
 - b. Pursuant to 35 Ill. Adm. Code 218.211(c) (2), the Permittee shall maintain the following each day for each coating applied on Line 1 when the afterburner is not in operation:
 - i. The name and identification of each coating as applied; and
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied.
 - c. The Permittee shall maintain the following records for Line 1 when the afterburner is in operation and all other coaters:
 - i. Name, usage (gallons/month and gallons/year), VOM and HAP content (% weight or lb/gallon), and VOM and HAP emissions for each coating as applied.
 - d. Usage of clean-up solvents (gallon/month and gallon/year); and

- e. Total VOM and HAP emissions from the facility (lb/month and tons/year).
 - f. For each day of operation of the afterburner the Permittee shall maintain the date and time of operation.
15. 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.
16. 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.
17. 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
18. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: Records required by Conditions 14(a) and (b).

It should be noted that this permit has been revised to correct afterburner monitoring equipment requirements in Condition 10(c).

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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

DES:EEJ:psj

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 Pres-On Tape and Gasket Corporation/s Adhesive Tape 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. Limiting the amount of VOM material usage and the application of an afterburner in operation on Line 1. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 25 tons per year of total HAPs, and 10 tons per year of a single HAP 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.

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3. Emissions and operation of Line 2 shall not exceed the following limits:

<u>Equipment</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
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