

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL
PERMITTEE

Acco Brands, Inc.
Attn: Safety & Environmental Coordinator
770 South Acco Plaza
Wheeling, Illinois 60090

<u>Application No.:</u> 91120093	<u>I.D. No.:</u> 031324ACC
<u>Applicant's Designation:</u>	<u>Date Received:</u> January 30, 2001
<u>Subject:</u> Painting Operation	
<u>Date Issued:</u> June 26, 2001	<u>Expiration Date:</u> June 26, 2006
<u>Location:</u> 770 South Acco Plaza, Wheeling	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of two paint booths, fifteen metal parts stamping presses, one bake off oven, air heating units, and two parts washers as described in 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., 25 tons/year for VOM, 10 tons/year for a single HAP, and 25 ton/year for totaled HAPs). 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.
- 2a. The coating booths are subject to and shall comply with the volatile organic materials (VOM) emission limitations of 35 Ill. Adm. Code Part 218, Subpart F: Coating Operations. Compliance with the requirements of this subpart is achieved through the use of compliance coating pursuant to 35 Ill. Adm. Code 218.204(j)(4)(B). The VOM content of the coatings, as applied, shall not exceed 2.8 lb/gal excluding water and any compounds which are specifically exempted from the definition of VOM.
- b. Emissions and operation of two paint booths shall not exceed the following limits:

<u>Raw Material</u>	<u>Material Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>Monthly</u>	<u>Annual</u>		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>

Paint	1,500 gal	11,500 gal	2.8 lb/gal	2.1	16.1
Clean-up Solvent	0.6 ton	4.5 ton	100 % wt.	0.6	4.5

These limits are based on the maximum production rate and the highest VOM content of raw materials. Compliance with annual limit shall be determined on a monthly basis from the sum of data for current month plus the preceding 11 months.

3. Emissions and operation of stamping presses shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u> (% Wt.)	<u>VOM Emissions</u>	
	(Ton/Mo)	(Ton/Yr)		(Ton/Mo)	(Ton/Yr)
Lubricant	0.6	2.83	99	0.6	2.80

These limits are based on the maximum production rate and the highest VOM content of raw materials. Compliance with annual limit shall be determined on a monthly basis from the sum of data for current month plus the preceding 11 months.

4. The emissions of hazardous air pollutants (HAP) 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. As a result of this condition, this permit is issued based on the emissions of any hazardous air pollutants from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
5. Operation and emissions of natural gas fired equipment (combined) shall not exceed the following limits:

Natural Gas Usage: 10 mmscf/mo, 120 mmscf/yr

<u>Pollutant</u>	<u>Emission Factor</u> (lb/mmscf)	<u>Emissions</u>	
		(Ton/Mo)	(Ton/Yr)
Nitrogen Oxides (NO _x)	100	0.5	6.0
Carbon Monoxide (CO)	84	0.4	5.0
Particulate Matter (PM)	7.6	0.04	0.5
Volatile Organic Materials (VOM)	5.5	0.03	0.3

These limits are based on the maximum firing rate and standard emission factors given by AP-42. Compliance with annual limit shall be determined on a monthly basis from the sum of data for current month plus the preceding 11 months.

6. Permittee shall maintain monthly records of the following items for material listed in Condition 3.
- Monthly and annual usage of all VOM containing materials.
 - VOM and HAP content of all material used.
 - VOM and HAP emissions as calculated using material balance from material usage and VOM and/or HAP content of material.
7. 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.

8. 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 and Enforcement 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.
9. 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 600169

10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: annual lubricant, coating and solvent usage and their VOM and HAP content.

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

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

DES:VJB:jar

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 painting operation 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 is usage of 11,500 gallons of paint, 4.5 tons of solvents and 2.8 tons of lubricant per year. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 10 tons per year of individual HAP and 25 tons per year for total HAPs 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.

1. Emissions and operation of two paint booths shall not exceed the following limits:

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	<u>Monthly</u>	<u>Annual</u>		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
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Clean-up Solvent	0.6 ton	4.5 ton	100 % wt.	0.6	4.5

2. Emissions and operation of stamping presses shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>		<u>(% Wt.)</u>	<u>(Ton/Mo)</u>
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